

Exhibit 97

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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST)
ATTACKS ON) 03-MDL-1570
SEPTEMBER 11, 2001) (GBD) (SN)
_____)

TUESDAY, JUNE 22, 2021

THIS TRANSCRIPT CONTAINS
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Remote videotaped deposition of
Samuel G. Coombs, held at the location of the
witness in Alabama, commencing at 11:33 a.m.
Central Time, on the above date, before
Carrie A. Campbell, Registered Diplomate
Reporter, Certified Realtime Reporter,
Shorthand Reporter, Certified Court
Reporter.

- - -

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<p>1 TRIAL TECHNICIAN: 2 BRIAN FRONZAGLIA, 3 Precision Trial Services 4 VIDEOGRAPHER: 5 DEVYN MULHOLLAND, 6 Golkow Litigation Services 7 --- 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 817 Contract PCA-93-017 for Operations 107 and Maintenance of ANSS IV 2 Program, KSA0000002127 - KSA0000002141 3 4 818 Ercan Engineering purchase 109 requests, US Transmittal #0013 (ANSS III), 5 DA010725 - DA010752 6 819 October 27, 1994 Selection of 119 Direct Supply Support Company, 7 DA010842 8 820 Dallah Avco, Contract to Ercan 121 Consulting Engineers, 9 DA010841 10 821 FBI Document, 134 11 [REDACTED] 12 822 FBI Document, 143 13 823 FBI Document, 148 14 824 FBI Document, 149 15 [REDACTED] 16 (Exhibits attached to the deposition.) 17 CERTIFICATE.....180 18 ACKNOWLEDGMENT OF DEPONENT.....182 19 ERRATA.....183 20 LAWYER'S NOTES.....184 21 22 23 24 25</p>
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<p>1 INDEX 2 PAGE 3 APPEARANCES..... 2 4 EXAMINATIONS 5 BY MR. DORRIS..... 10 6 BY MR. KRY..... 76 7 BY MR. POUNIAN..... 153 8 BY MR. DORRIS..... 173 9 BY MR. KRY..... 177 10 11 EXHIBITS 12 No. Description Page 13 810 Declaration of Samuel G. Coombs 12 14 811 Request for modification and/or 25 authorization of contract/agreement No. 1616 15 812 Avco Overseas Services payment 25 guarantee - Omar Al-Bayoumi, 16 DA002267 17 813 Presidency of Civil Aviation 25 Regular Time Report, 18 DA000398 19 814 Notice of Deposition and Rule 45 72 Subpoena 20 21 815 October 23, 1995 letter to Ercan 88 Incorporated, 22 DA010695 - DA010722 23 24 816 Request for Payment (OKL), 100 DA010334 - DA010346 25</p>	<p>1 VIDEOGRAPHER: We are now on 2 the record. 3 My name is Devyn Mulholland. 4 I'm a videographer with Golkow 5 Litigation Services. 6 Today's date is June 22, 2021. 7 The time is 11:33 a.m. Central Time. 8 This remote video deposition is 9 being held In the Matter of Terrorist 10 Attacks on September 11, 2001. 11 The deponent is Samuel G. 12 Coombs. 13 All parties to this deposition 14 are appearing remotely and have agreed 15 to the witness being sworn in 16 remotely. 17 Due to the nature of remote 18 reporting, please pause briefly before 19 speaking to ensure all parties are 20 heard completely. 21 All counsels' appearances will 22 be noted on the stenographic record. 23 The court reporter is Carrie 24 Campbell and will now swear in the 25 witness.</p>

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<p style="text-align: right;">Page 10</p> <p>1 SAMUEL G. COOMBS, 2 of lawful age, having been first duly sworn 3 to tell the truth, the whole truth and 4 nothing but the truth, deposes and says on 5 behalf of the Defendant Kingdom of Saudi 6 Arabia, as follows: 7 8 DIRECT EXAMINATION 9 QUESTIONS BY MR. DORRIS: 10 Q. Good afternoon, Mr. Coombs. My 11 name is Dan Dorris. I represent Saudi Arabia 12 in this case. 13 How are you today? 14 A. I'm doing good. 15 Q. Have you been deposed before, 16 Mr. Coombs? 17 A. Excuse me? 18 Q. Have you been deposed before, 19 Mr. Coombs? 20 A. Have I been under oath before? 21 Q. Have you given a deposition 22 before? 23 A. I've given a deposition to the 24 Highway Commission. 25 Q. This may be a little different</p>	<p style="text-align: right;">Page 12</p> <p>1 Mr. Coombs, I'll just go over 2 some ground rules of the deposition. Let me 3 know if these are fair to you. 4 The court reporter is going to 5 try and take a transcript of everything you 6 say, which makes it important that we not 7 speak over one another. I'll do my best to 8 make sure you finish your answers, and if you 9 could wait until I finish my questions, it 10 will be much easier for the court reporter 11 and she'll be a happier person today. 12 If you ever need to take a 13 break during the day, please let me know. 14 The only thing that I would ask is if there's 15 a question pending, that you finish the 16 current question. But take a break at your 17 leisure if you need to. 18 All right. Brian, can you 19 please pull up Tab 01. 20 (Coombs Exhibit 810 marked for 21 identification.) 22 QUESTIONS BY MR. DORRIS: 23 Q. Mr. Coombs, is this the 24 declaration you submitted in this case? 25 A. Yes.</p>
<p style="text-align: right;">Page 11</p> <p>1 than you're used to, so -- {audio 2 interruption} -- explain -- 3 There's a little bit of an echo 4 on your side. I don't know if there's a way 5 to fix that, Barbi. I can work through it, 6 if possible. 7 VIDEOGRAPHER: I believe they 8 might be having a lag of Internet 9 connection. That's why it's coming in 10 as an echo. 11 Do you want to go off the 12 record to see if they can switch to a 13 phone? 14 MS. AGRICOLA: Yes. Yeah, 15 let's see if we can -- {audio 16 interruption} -- here. We'll see if 17 we can get this fixed. 18 VIDEOGRAPHER: Off the record 19 at 11:35 a.m. 20 (Off the record at 11:35 a.m.) 21 VIDEOGRAPHER: Back on the 22 record at 11:38 a.m. 23 QUESTIONS BY MR. DORRIS: 24 Q. I hope we've resolved our 25 technical problems for the morning.</p>	<p style="text-align: right;">Page 13</p> <p>1 Q. Can you please turn to page 3 2 of the declaration, Brian? 3 MR. KRY: Dan, could we get the 4 exhibit number for the record, please? 5 MR. DORRIS: Yes. Let's enter 6 this as Exhibit 810. 7 QUESTIONS BY MR. DORRIS: 8 Q. Mr. Coombs, your declaration 9 states that you met Omar Bayoumi in November 10 of 1994, correct? 11 A. Yes. 12 Q. How long was this encounter 13 with Mr. Bayoumi? 14 A. Less than ten minutes. 15 Q. This ten-minute meeting 16 occurred approximately 25 years ago, correct? 17 A. Yes, sir. 18 Q. Is it correct that this meeting 19 was your only personal interaction with Omar 20 Al-Bayoumi? 21 A. Yes. 22 Q. You had no responsibility for 23 overseeing Omar Al-Bayoumi, correct? 24 A. Not directly. 25 Q. You had no responsibility for</p>

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<p style="text-align: right;">Page 14</p> <p>1 overseeing Omar Al-Bayoumi's work with PCA, 2 correct? 3 A. No, I did not. 4 Q. You had no responsibility for 5 overseeing the progress of Mr. Al-Bayoumi's 6 studies, correct? 7 A. No. No. You're correct, no. 8 Q. You had no responsibility for 9 hiring Omar Al-Bayoumi? 10 A. Right, I did not. 11 Q. You have no knowledge about 12 Omar Al-Bayoumi's work qualifications, 13 correct? 14 A. I did not. 15 Q. You have no knowledge about 16 Mr. Omar Al-Bayoumi's job experience, 17 correct? 18 A. Say again, please? 19 Q. You have no knowledge about 20 Omar Al-Bayoumi's work history, correct? 21 A. No, I did not. 22 Q. You have no knowledge Mr. Omar 23 Al-Bayoumi's educational experience, correct? 24 A. No, I did not. 25 Q. Mr. Coombs, you started in the</p>	<p style="text-align: right;">Page 16</p> <p>1 Al-Hekma medical. 2 Q. Can you say that again? 3 Working for what? 4 A. I left them. I left the 5 Presidency of Civil Aviation and went to work 6 for Al-Hekma medical. 7 Q. Prior to the summer of 1994, 8 you had no involvement with PCA, correct? 9 A. No, I was with Kawasaki 10 Helicopter. Presidency -- it was -- it was 11 Civil Defense. 12 Q. Prior to the summer of 1994, 13 you had no firsthand knowledge of 14 Mr. Bayoumi's employment relationship with 15 either PCA or Dallah Avco, correct? 16 A. That's correct. 17 Q. You had no knowledge of whether 18 he was a student prior to the summer of 1994, 19 correct? 20 A. No. 21 Q. You had no knowledge of what 22 his job responsibilities were prior to the 23 summer of 1994, correct? 24 A. That's correct. 25 Q. Prior to the summer of 1994,</p>
<p style="text-align: right;">Page 15</p> <p>1 logistics department at PCA in the summer 2 of 1994, correct? 3 A. Yes. 4 Q. And PCA stands for the -- what 5 does PCA stand for? 6 A. Presidency of Civil Aviation. 7 Q. You worked in Jeddah, Saudi 8 Arabia, while you were at PCA, correct? 9 A. Yeah. 10 Q. You left -- 11 A. Yes, that was my main office. 12 Q. You left your position as 13 logistical manager with PCA in June 1997, 14 correct? 15 A. Correct. 16 Q. And when you left your position 17 in -- with the PCA in June 1997, you also 18 left Jeddah, correct? 19 A. No. 20 Q. Did you stay in Jeddah after 21 June 1997? 22 A. Yes. 23 Q. How long did you stay in Jeddah 24 after June 1997? 25 A. For three years working for</p>	<p style="text-align: right;">Page 17</p> <p>1 you had no firsthand knowledge of any 2 payments made by either PCA or Dallah Avco to 3 Omar Al-Bayoumi, correct? 4 A. Correct. 5 Q. After June 1997, you had no 6 involvement with PCA, correct? 7 A. No, I did not. 8 Q. After June 1997, you would -- 9 you have no firsthand knowledge of 10 Mr. Al-Bayoumi's employment relationship with 11 either PCA or Dallah Avco, correct? 12 A. No, I did not. 13 Q. After June 1997, you have no 14 firsthand knowledge of whether Omar 15 Al-Bayoumi was a student, correct? 16 A. No, I did not. 17 Q. After June 1997, you have no 18 firsthand knowledge of any job 19 responsibilities that Omar Al-Bayoumi had, 20 correct? 21 A. Correct. 22 Q. I'm sorry, I couldn't hear your 23 answer. 24 Did you say correct? 25 A. That's correct.</p>

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<p>1 Q. After June 1997, you have no 2 firsthand knowledge of any payments made by 3 either PCA or Dallah Avco to Omar Al-Bayoumi, 4 correct?</p> <p>5 A. That's correct.</p> <p>6 Q. During your time at PCA, your 7 responsibility was related to logistics 8 department, correct?</p> <p>9 A. Yes.</p> <p>10 Q. Can you describe for me what 11 your job responsibilities were with the 12 logistics department?</p> <p>13 A. Well, in logistics I started 14 out, I had a staff mixed between the 15 warehouse and administrative staff. I had a 16 traveling staff that went around to inventory 17 the -- the navigation systems all around the 18 Kingdom.</p> <p>19 We had eight different 20 maintenance sites, and I was responsible to 21 make sure that the logistics in all those 22 different eight locations were maintained. 23 And they were at primary airports in Saudi 24 Arabia.</p> <p>25 Okay. From that, the parts</p>	<p>1 a half a day and I came back.</p> <p>2 And then a decision was made 3 without me even knowing about it, but that's 4 normal. So I started ordering parts through 5 France and continued through the FAA.</p> <p>6 Q. The logistics department was 7 part of -- I'm sorry, if I cut you off, 8 please continue.</p> <p>9 Were you finished?</p> <p>10 MS. AGRICOLA: You were saying 11 something about logistics. Did he cut 12 you off?</p> <p>13 THE WITNESS: Okay. The 14 logistics department, for the most 15 part, had sufficient funding because 16 of what they had advertised to the 17 International Aviation Authority, ICAO 18 out of Montreal, Canada. They had to 19 show they had so much money in 20 logistics and so on like that because 21 they were part of ICAO, International 22 Aviation Authority, around the world. 23 So I had to have some contact with 24 them, too. I never went to Montreal, 25 but I still had contact with them.</p>
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<p>1 flow, I worked with the Federal Aviation 2 Administration out of Oklahoma getting parts 3 for the older navigation systems that had 4 been purchased through the federal 5 government, US federal government. Then I 6 had to work out the payments and so on direct 7 from Dallah Avco who was handling the payment 8 process through their contract with PCA. 9 They would do the direct payment.</p> <p>10 They were behind four years on 11 one payment of \$860,000. I got that 12 processed in FAA. Then they released again 13 and we could start ordering parts again.</p> <p>14 I smoothed out some of the 15 logistics problems that they were having with 16 Italy and France. And there was just some 17 things that were shuffling back and forth.</p> <p>18 The French were trying to bid 19 on replacing some of the systems, and the 20 Italians were bidding on it, so I had to go 21 to Belisi {phonetic}, France, and sit there 22 and listen to them.</p> <p>23 And then they bypassed me for 24 Italy, so I didn't go there, but I went to 25 London, and that didn't -- it didn't last but</p>	<p>1 QUESTIONS BY MR. DORRIS:</p> <p>2 Q. Thank you.</p> <p>3 A. That was just the last part of 4 it.</p> <p>5 Q. The logistics department was 6 one department of the Airways Engineering 7 division, correct?</p> <p>8 A. Yes.</p> <p>9 Q. There were other departments at 10 airways -- at the Airways Engineering 11 division, correct?</p> <p>12 A. Yes.</p> <p>13 Q. What were some of those other 14 departments?</p> <p>15 A. There was engineering. There 16 was development. There was outside 17 contracting for different sites because each 18 site was leased and everything, so they had 19 people who were managing that.</p> <p>20 They had -- the engineering 21 department was huge because they were trying 22 to do upgrades and things like this. And so 23 that engineering department was very, very 24 high upgrade. They had a lot of people in 25 the engineering department.</p>

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<p>1 They had a -- software 2 development was -- was there. They had a 3 software program of their own that they were 4 working on. They hired people out of England 5 and out of Germany for that. 6 And they were in the PCA 7 headquarters building, which is right next to 8 where I was at, and I was in the other 9 building. 10 Q. You were the manager for the -- 11 for the logistics department, correct? 12 A. Yes. 13 Q. And the logistics department 14 was just one department of the Airways 15 Engineering division, correct? 16 A. That's correct. 17 Q. You were not responsible for 18 the budgets of the other departments within 19 the Airways Engineering division, correct? 20 A. No, I was not. 21 Q. You were not responsible for 22 payments coming from those other departments 23 within Airways Engineering division, correct? 24 A. No, I was not. 25 Q. Brian, can you put back up</p>	<p>1 time, I was not aware of any other funds 2 going to Mr. Al-Bayoumi," correct? 3 A. That is correct. 4 Q. During your tenure at PCA, you 5 had no firsthand knowledge of any payments 6 being made to Al-Bayoumi other than those 7 made through the logistics department, 8 correct? 9 A. That is correct. 10 Q. Now, the next paragraph states 11 that you were shown some documents by the 12 Kreindler & Kreindler firm, correct? 13 A. Yes. 14 Q. Do you understand that the 15 Kreindler & Kreindler firm is representing 16 the plaintiffs in this action who have sued 17 Saudi Arabia? 18 A. (Witness nods head.) 19 Q. And can you give a verbal 20 answer? I'm sorry. 21 A. Yes, I did. 22 Q. This states that they showed 23 you three specific documents, and they're 24 given the titles DA1016, DA2267 and DA398. 25 Were you shown any other</p>
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<p>1 Mr. Coombs' declaration, page 3? 2 I'm just putting this on the 3 screen, Mr. Coombs, because I'm going to ask 4 you some specific statements within this 5 declaration, just as an aid for you to review 6 during my questions. 7 In the third paragraph, 8 Mr. Coombs, the last sentence, do you see 9 where it says -- or sorry, the second to last 10 sentence. Do you see where it says, 11 "Mr. Al-Bayoumi's tuition and expenses were 12 paid through the logistics department funding 13 through the Dallah Avco/PCA arrangement"? 14 A. Yes. 15 Q. Do you see that portion? 16 A. (Witness nods head.) 17 Q. Okay. One other thing -- 18 A. You see -- 19 Q. I know -- I know you would nod 20 in a normal conversation, but just so we can 21 have a clear transcript, can you make sure 22 when you're nodding to say "yes" or 23 "correct"? 24 A. That is correct. 25 Q. You further state, "At the</p>	<p>1 documents by the Kreindler & Kreindler firm? 2 A. No. Those forms, DA, I thought 3 they were Department of the Army forms, but 4 they weren't. They had their own format, and 5 they were authorized amounts that I had never 6 even imagined. I could not even imagine it. 7 Q. Were you shown any other -- 8 A. Because it appeared like -- 9 Q. My apologies. I think we were 10 talking past one another there. 11 Were you shown any other 12 documents, other than the three listed here, 13 DA1016, DA2267 and DA398? 14 A. No. 15 Q. So to the best of your 16 recollection, the Kreindler & Kreindler firm 17 showed you three specific documents, correct? 18 A. Correct. 19 (Coombs Exhibits 811, 812 and 20 813 marked for identification.) 21 QUESTIONS BY MR. DORRIS: 22 Q. Let's mark each of these as 23 exhibits. We will mark DA1016 as 24 Exhibit 811, and, Brian, that is Tab 17. 25 We'll mark DA2267 as</p>

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<p style="text-align: right;">Page 26</p> <p>1 Exhibit 812, and that is Tab 16, Brian. 2 And we will mark DA398 as 3 Exhibit 813, and that is Tab 18, Brian. 4 MR. HAEFELE: Dan, just so the 5 record's clear, the first two exhibits 6 were previously marked in other 7 depositions in the litigation. 8 MR. DORRIS: If anyone has 9 those exhibit numbers off the top of 10 their head, we can refer back to those 11 or we can reintroduce them. I don't 12 have the prior exhibit numbers with 13 me. 14 MR. POUNIAN: I think 811 is 15 Exhibit 371, and 813 is page 70 of 16 Exhibit 108. 17 MR. DORRIS: Let's just remark 18 them. 19 MR. KRY: For the record, I 20 think 2267 is also Exhibit 115. 21 MR. DORRIS: All right. Let's 22 just remark them now so we don't have 23 to go back and make certain. I don't 24 want to make a mistake on that. 25</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. For your declaration, Brian, 2 can you scroll to the last page of 3 Exhibit 810? 4 Did you sign your declaration 5 on January 25, 2021? 6 A. Yes, I did. 7 Q. The Kreindler & Kreindler firm, 8 to the best of your recollection, came to 9 meet with you in January of 2021? 10 A. Yeah, they came directly here. 11 Q. Who did you meet with? 12 A. Keith -- Keith Williams. 13 Q. Was there anyone else at that 14 meeting? 15 A. No. 16 Q. Was there one meeting or 17 multiple meetings? 18 A. Multiple. 19 Q. How many meetings did you have 20 with the Kreindler & Kreindler firm? 21 A. As we were putting this 22 together, I think it was five. They were 23 short because it was during -- I was doing my 24 bus routes. 25 Q. Each of these meetings occurred</p>
<p style="text-align: right;">Page 27</p> <p>1 QUESTIONS BY MR. DORRIS: 2 Q. Now, Mr. Coombs, based on the 3 documents, these three documents provided to 4 you by the Kreindler firm, in paragraph 3 5 your declaration -- or in the fourth 6 paragraph your declaration states, "The 7 documents clearly demonstrate that 8 Mr. Al-Bayoumi was receiving a salary and 9 benefits paid by Dallah Avco for working as a 10 PCA employee, in addition to and at the same 11 time that Mr. Al-Bayoumi was being paid 12 education and other expenses from my 13 logistics department budget." 14 Correct? 15 A. Yes. 16 Q. Now, you had never seen these 17 three documents prior to being shown them by 18 the Kreindler & Kreindler firm, correct? 19 A. No, I had not. 20 Q. When were you shown them by the 21 Kreindler & Kreindler firm? 22 A. It was when I -- a couple of 23 days before I did this. They came here and 24 interviewed me, and it was -- it was in 25 January, third week of January, like that.</p>	<p style="text-align: right;">Page 29</p> <p>1 in January 2021? 2 A. Right. Yes. 3 Q. And each of these meetings was 4 between yourself and Keith Williams? 5 A. Correct. 6 Q. There was no one else at any of 7 the meetings? 8 A. Not physically present. We 9 were on a conference call on one of them. 10 Q. Okay. So for each of the five 11 meetings, you physically met with Keith 12 Williams, correct? 13 A. That's correct. 14 Q. And for one -- and he was the 15 only other person physically present, 16 correct? 17 A. Correct. 18 Q. For one of the meetings, other 19 people participated by telephone, correct? 20 A. Correct. 21 Q. Who participated by telephone? 22 A. I don't remember. 23 Q. Do you know how many people 24 participated by telephone? 25 A. I heard multiple voices and</p>

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<p style="text-align: right;">Page 30</p> <p>1 things like that, but I'm not really sure.</p> <p>2 Q. Returning to the fourth</p> <p>3 paragraph of your declaration -- you could</p> <p>4 put that back on the screen, Brian.</p> <p>5 When you state that "the</p> <p>6 documents clearly demonstrate that</p> <p>7 Mr. Al-Bayoumi was receiving a salary and</p> <p>8 benefits paid by Dallah Avco for working as a</p> <p>9 PCA employee in addition to and at the same</p> <p>10 time that Mr. Al-Bayoumi was being paid</p> <p>11 education and other expenses from my</p> <p>12 logistics department budget," you are basing</p> <p>13 that statement solely on your review of the</p> <p>14 three documents provided by the Kreindler &</p> <p>15 Kreindler firm, correct?</p> <p>16 A. Correct.</p> <p>17 Q. Prior to being shown those</p> <p>18 documents, you had no reason to believe that</p> <p>19 Mr. Al-Bayoumi was receiving any salary and</p> <p>20 benefits apart from what the doc -- apart</p> <p>21 from any payments through the logistics</p> <p>22 department, correct?</p> <p>23 A. No, I was not aware of it at</p> <p>24 all.</p> <p>25 Q. Okay. Let's look at these</p>	<p style="text-align: right;">Page 32</p> <p>1 department?</p> <p>2 A. It means it had to go to</p> <p>3 someone else for approval.</p> <p>4 Q. Why does the fact that it went</p> <p>5 to someone else for approval indicate that</p> <p>6 Omar Al-Bayoumi is receiving any payment</p> <p>7 other than through the logistics department?</p> <p>8 A. In the Presidency of Civil</p> <p>9 Aviation, they had several flows that I</p> <p>10 didn't even participate in, and I didn't</p> <p>11 know.</p> <p>12 Q. Right.</p> <p>13 You were one aware of this</p> <p>14 document, correct?</p> <p>15 A. That's correct. Never saw it</p> <p>16 before.</p> <p>17 Q. And you were unaware of the</p> <p>18 meaning of this document, correct?</p> <p>19 A. That's correct.</p> <p>20 Q. Let's look at Tab 16,</p> <p>21 Exhibit 812, DA398. Or did I mess that up?</p> <p>22 So tabs --</p> <p>23 BRIAN FRONZAGLIA: Tab 16 was</p> <p>24 identified as 812.</p> <p>25 MR. DORRIS: Tab 16812, DA2267.</p>
<p style="text-align: right;">Page 31</p> <p>1 three documents.</p> <p>2 Brian, can you pull up Tab 17</p> <p>3 first, Exhibit 811, DA1016?</p> <p>4 Mr. Coombs, this is one of the</p> <p>5 documents shown to you by the Kreindler &</p> <p>6 Kreindler firm, correct?</p> <p>7 A. Yes.</p> <p>8 Q. And you had never seen this</p> <p>9 document before being shown it by the</p> <p>10 Kreindler & Kreindler firm?</p> <p>11 A. Never.</p> <p>12 Q. This document came from a</p> <p>13 separate department than the one -- than the</p> <p>14 logistics department, correct?</p> <p>15 A. That's correct, because it</p> <p>16 doesn't have my signature on it.</p> <p>17 Q. What in this document</p> <p>18 demonstrates that Omar Al-Bayoumi was</p> <p>19 receiving any payment other than through the</p> <p>20 logistics department?</p> <p>21 A. Mohammed Al-Salmi's signature</p> <p>22 at the bot -- initials, at the bottom.</p> <p>23 Q. Why do Mr. Al-Salmi's initials</p> <p>24 indicate that Al-Bayoumi is receiving any</p> <p>25 payment other than through the logistics</p>	<p style="text-align: right;">Page 33</p> <p>1 Let's go to -- sorry, my apologies. I</p> <p>2 got them out of order.</p> <p>3 Let's go to Exhibit 813 first,</p> <p>4 Tab 18.</p> <p>5 QUESTIONS BY MR. DORRIS:</p> <p>6 Q. And this is DA398.</p> <p>7 Mr. Coombs, this is another one</p> <p>8 of the documents you were shown by the</p> <p>9 Kreindler & Kreindler firm, correct?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. You had never seen this</p> <p>12 document prior to being shown it by the</p> <p>13 Kreindler & Kreindler firm?</p> <p>14 A. No, I had not.</p> <p>15 Q. This was not a document you</p> <p>16 encountered in your job duties at the</p> <p>17 logistics department, correct?</p> <p>18 A. In my department, we had -- it</p> <p>19 was a similar timesheet that I had to do for</p> <p>20 every employee.</p> <p>21 Q. What in this document</p> <p>22 demonstrates that Omar Al-Bayoumi was</p> <p>23 receiving any payment other than through the</p> <p>24 logistics department?</p> <p>25 A. Well, it showed his hours and</p>

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<p style="text-align: right;">Page 34</p> <p>1 consistency with the timing. That's inside 2 Saudi Arabia. The timing -- the money that I 3 sent, I didn't send it based on work hours. 4 I sent it based on requests of sums of money, 5 not for employment. 6 Q. Correct. 7 The document shows work hours, 8 right? 9 A. Yes, it shows work hours. 10 Q. So it does not show any 11 payments to Omar Al-Bayoumi, correct? 12 A. No, it doesn't show any 13 payments, but it's the -- what the finance 14 people use as an authorization for payment. 15 Q. So this document by itself does 16 not show any payments, correct? 17 A. No, it doesn't. 18 Q. Let's turn to Tab 16, 19 Exhibit 812. 20 This is another one of the 21 documents shown to you by the Kreindler & 22 Kreindler firm, correct? 23 A. Yes. 24 Q. You had not seen this document 25 before being shown it -- shown it by the</p>	<p style="text-align: right;">Page 36</p> <p>1 Avco was irritated with this process in -- 2 because they wouldn't talk to me. Avco was 3 being dropped off the list when I came on 4 board as the assistant manager. When I was 5 the assistant manager, they were -- they got 6 dropped off the list during that year, so I 7 didn't know much about it. 8 Q. Mr. Coombs, does this document 9 state how those payments were to be made to 10 Omar Al-Bayoumi? 11 A. Not that I can see. 12 Q. Do you have any firsthand 13 knowledge of how these payments, if they were 14 made, were made to Omar Al-Bayoumi? 15 A. An authorization document is 16 signed off by Al-Salmi. It would go to 17 Dallah Avco -- or go to Dallah, okay? Then 18 Dallah would process the funds and transfer 19 the funds to the US bank, or they would do it 20 through the American side of Dallah Avco. 21 But during that period of time 22 there was some questions, and as I took over, 23 it stopped going to Dallah Avco and it went 24 to this Dallah. And then they made direct 25 deposits from the bank there in Jeddah, Saudi</p>
<p style="text-align: right;">Page 35</p> <p>1 Kreindler & Kreindler firm? 2 A. No, I've never seen that 3 before. Yeah. Well, at that point I did, 4 but, no, I didn't see it before. 5 Q. This documents is dated 6 March 30, 1994, correct? 7 A. Yeah, that's prior to my -- 8 Q. That's prior to when you joined 9 PCA, correct? 10 A. Yes. 11 Q. Can you zoom back out, Brian? 12 This request requests that Avco 13 Overseas pay tuition for Al-Bayoumi in the 14 amount of \$4,430 and a weekly living 15 allowance of \$600 per week, correct? 16 A. Yeah. 17 Q. The tuition was for the 18 American Language Institute at San Diego 19 State University. 20 Do you see that? 21 A. Yes, I see it. 22 Q. Does this document state how 23 those payments were to be made to Omar 24 Al-Bayoumi? 25 A. Maybe one of the reasons that</p>	<p style="text-align: right;">Page 37</p> <p>1 Arabia, to his bank in the US. 2 Q. Do you have any firsthand 3 knowledge of which department at Dallah Avco 4 would have made these payments to Omar 5 Al-Bayoumi, if they were made? 6 MR. KRY: Objection to form and 7 foundation. 8 THE WITNESS: No, I don't. 9 Because like I said, when I came on 10 board, they had -- they had broken 11 their ties with -- with our contract. 12 QUESTIONS BY MR. DORRIS: 13 Q. Do you have any firsthand 14 knowledge of which department at either PCA 15 or Dallah Avco would have made these payments 16 to Omar Al-Bayoumi if they were made? 17 MR. KRY: Objection. Form. 18 THE WITNESS: Down at the 19 department level, you know, once it's 20 approved by Al-Salmi, it goes up to 21 the payment process with -- it would 22 go to Alp Karli, and then he'd take it 23 to Dallah. Alp Karli was our 24 financial transfer guy. 25</p>

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<p style="text-align: right;">Page 38</p> <p>1 QUESTIONS BY MR. DORRIS:</p> <p>2 Q. Right.</p> <p>3 And, Mr. Coombs, my questions</p> <p>4 are about your declaration and your</p> <p>5 statements that Mr. Al-Bayoumi had received</p> <p>6 payments through the logistics department and</p> <p>7 your belief that he received payments through</p> <p>8 other departments besides the logistics</p> <p>9 department.</p> <p>10 Do you understand that?</p> <p>11 A. I only stated that he made --</p> <p>12 we made payments to him because I would sign</p> <p>13 off on what Al-Salmi would send me, and then</p> <p>14 I would send it back over to him and he'd</p> <p>15 send it to Alp Karli. Alp Karli would then</p> <p>16 go process it.</p> <p>17 And that's the process we went</p> <p>18 through. Al-Salmi would send me the initial</p> <p>19 sheet. He had already initialed it. I'd</p> <p>20 sign it because that means it comes out of my</p> <p>21 budget.</p> <p>22 Then it would go to -- back to</p> <p>23 Al-Salmi, then to Alp Karli, and then to</p> <p>24 whomever is making the payments. Dallah.</p> <p>25 It was not done outside the</p>	<p style="text-align: right;">Page 40</p> <p>1 operating practices. Mr. Al-Salmi always</p> <p>2 stressed to me that an individual had to be</p> <p>3 specifically qualified for a position before</p> <p>4 they would be hired by the PCA."</p> <p>5 Do you see that?</p> <p>6 A. Yes. And that was the verbiage</p> <p>7 that he consistently used to me. They had to</p> <p>8 be qualified to get a salary. I did not ever</p> <p>9 know that he was drawing a salary.</p> <p>10 Q. Is it correct that you -- I</p> <p>11 believe you may have answered this, but I</p> <p>12 just want an answer for the record.</p> <p>13 Is it correct that you</p> <p>14 considered PCA's handling of Mr. Al-Bayoumi</p> <p>15 to be way outside the box because of your</p> <p>16 belief that he was paid as a student through</p> <p>17 the logistics department and also paid as an</p> <p>18 employee?</p> <p>19 A. Yes. That seems -- you know,</p> <p>20 after I see these documents, then I made this</p> <p>21 statement. And until I saw those documents,</p> <p>22 I didn't know about it.</p> <p>23 Q. Well, Mr. Coombs, we just went</p> <p>24 through each one of the documents, and</p> <p>25 correct me if I'm wrong, but for each one of</p>
<p style="text-align: right;">Page 39</p> <p>1 box. It was not direct, to the best of my</p> <p>2 knowledge.</p> <p>3 Q. Looking back at Exhibit 813 on</p> <p>4 the screen, does anything in this document --</p> <p>5 I'm sorry, the prior exhibit, 8 -- the one we</p> <p>6 were just on, 812.</p> <p>7 Does anything in this document</p> <p>8 indicate whether the payments mentioned in</p> <p>9 this letter were made through the logistics</p> <p>10 department or by any other means?</p> <p>11 A. (Witness shakes head.)</p> <p>12 Q. Was that a no, Mr. Coombs?</p> <p>13 A. No.</p> <p>14 Q. Nothing in this document</p> <p>15 indicates whether the payments were made</p> <p>16 through the logistics department or some</p> <p>17 other department, correct?</p> <p>18 A. No, it doesn't show the</p> <p>19 department. It shows authorization, a direct</p> <p>20 authorization.</p> <p>21 Q. Going back to page 3 of your</p> <p>22 declaration, you state in the fourth</p> <p>23 paragraph, "I find that PCA's handling of</p> <p>24 Mr. Al-Bayoumi is way outside of the box and</p> <p>25 not consistent with Mr. Al-Salmi's normal</p>	<p style="text-align: right;">Page 41</p> <p>1 those documents you did not state -- you</p> <p>2 stated that the document did not indicate how</p> <p>3 any of the payments were to be made, whether</p> <p>4 they were through the logistics department or</p> <p>5 any other department.</p> <p>6 MR. POUNIAN: Objection.</p> <p>7 THE WITNESS: If it was the</p> <p>8 logistics department, it would have</p> <p>9 "logistics department" on it, and it</p> <p>10 would have my initials on it. Then</p> <p>11 they can withdraw the money from my</p> <p>12 budget.</p> <p>13 Without my initials, it didn't</p> <p>14 come from my budget.</p> <p>15 QUESTIONS BY MR. DORRIS:</p> <p>16 Q. Okay. Let's go back to the</p> <p>17 documents. Let's look at Exhibit 811 again.</p> <p>18 Does this document indicate</p> <p>19 that any payment was made to Omar Al-Bayoumi?</p> <p>20 A. I can't see proof of it except</p> <p>21 that Mohammed Al-Salmi -- and obviously</p> <p>22 somebody had to have translated it.</p> <p>23 Q. You see no proof of any payment</p> <p>24 to Omar Al-Bayoumi from this document,</p> <p>25 correct?</p>

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<p style="text-align: right;">Page 42</p> <p>1 A. Not that I can see.</p> <p>2 Q. This is one of the three</p> <p>3 documents you relied on for your statement</p> <p>4 that Omar Al-Bayoumi was paid a salary,</p> <p>5 correct?</p> <p>6 A. It was my impression.</p> <p>7 Q. But you see no proof of that</p> <p>8 payment from this document, correct?</p> <p>9 MS. AGRICOLA: Object to form.</p> <p>10 QUESTIONS BY MR. DORRIS:</p> <p>11 Q. Is that a no, Mr. Coombs?</p> <p>12 A. No.</p> <p>13 Q. All right. Let's look at</p> <p>14 Exhibit 813.</p> <p>15 Do you see any proof of a</p> <p>16 payment to Omar Al-Bayoumi from this</p> <p>17 document?</p> <p>18 A. I see support for a payment</p> <p>19 because it's got his name on it and his hours</p> <p>20 on it, a timesheet.</p> <p>21 Q. Do you see any indication in</p> <p>22 this document that Omar Al-Bayoumi was paid a</p> <p>23 salary?</p> <p>24 A. He would have to be getting a</p> <p>25 salary if he had a timesheet signed by</p>	<p style="text-align: right;">Page 44</p> <p>1 Exhibit 812?</p> <p>2 This document does not state</p> <p>3 that Omar Al-Bayoumi received a salary of any</p> <p>4 kind, correct?</p> <p>5 A. It was prior to my tenure, and</p> <p>6 it was sent directly to the United -- to Avco</p> <p>7 Overseas Services in Houston. And this would</p> <p>8 have been sufficient authorization for them</p> <p>9 to take it out of whatever was -- contract</p> <p>10 they had been awarded. There had to be lines</p> <p>11 in that contract, okay, for them to make</p> <p>12 payments.</p> <p>13 And so then they would get a</p> <p>14 request, the financial guy would go in and</p> <p>15 deduct it from that line and pay it. That's</p> <p>16 all this is, is an authorization. That is --</p> <p>17 Q. As we discussed earlier, this</p> <p>18 document states that Omar Al-Bayoumi would --</p> <p>19 strike that.</p> <p>20 This letter requests that Avco</p> <p>21 Overseas would pay tuition for Omar</p> <p>22 Al-Bayoumi in the amount of \$4,430 and weekly</p> <p>23 living allowance of \$600 per week, correct?</p> <p>24 A. Correct. That's what it says.</p> <p>25 Q. This was a request for a</p>
<p style="text-align: right;">Page 43</p> <p>1 Al-Salmi.</p> <p>2 Q. Who is responsible for paying</p> <p>3 salaries at Dallah Avco?</p> <p>4 MR. KRY: Objection to form.</p> <p>5 THE WITNESS: Alp Karli took</p> <p>6 all the documentation over to Avco.</p> <p>7 QUESTIONS BY MR. DORRIS:</p> <p>8 Q. That was not -- paying salaries</p> <p>9 was not part of your job responsibilities,</p> <p>10 correct?</p> <p>11 A. No. I couldn't even get my</p> <p>12 own. It came through Dallah. They didn't</p> <p>13 make direct payments to me.</p> <p>14 But without my timesheet, I</p> <p>15 couldn't get paid. So he got a timesheet,</p> <p>16 obviously he got paid. I can't see a denial.</p> <p>17 Q. But you were not responsible</p> <p>18 for paying that salary, correct?</p> <p>19 A. No. Because look at the job</p> <p>20 description up in the right-hand corner.</p> <p>21 Q. You had no involvement in</p> <p>22 paying that salary, correct?</p> <p>23 A. That's -- that was a tech side.</p> <p>24 No. I never even saw these timesheets.</p> <p>25 Q. Can we go to Tab 16,</p>	<p style="text-align: right;">Page 45</p> <p>1 payment of educational expenses, not a</p> <p>2 salary, correct?</p> <p>3 A. That's correct.</p> <p>4 Q. And so is it correct that this</p> <p>5 document does not request any salary to be</p> <p>6 paid to Omar Al-Bayoumi? Correct?</p> <p>7 A. It doesn't request salary, no,</p> <p>8 it doesn't.</p> <p>9 Q. And this is one of the three</p> <p>10 documents you relied on for your belief that</p> <p>11 Omar Al-Bayoumi was receiving a salary,</p> <p>12 correct?</p> <p>13 MR. POUNIAN: Objection to the</p> <p>14 form of the question.</p> <p>15 QUESTIONS BY MR. DORRIS:</p> <p>16 Q. Is that correct, Mr. Coombs?</p> <p>17 A. When you take a look at this,</p> <p>18 it shows that he had benefits above -- what I</p> <p>19 was authorizing out of my budget was almost</p> <p>20 the same thing.</p> <p>21 Q. Mr. --</p> <p>22 A. So he was double-dipping.</p> <p>23 Q. Mr. Coombs, does this document</p> <p>24 predate your time at --</p> <p>25 A. Yes, it does.</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q. So at the time of this</p> <p>2 document, you were not authorizing anything</p> <p>3 for Mr. Al-Bayoumi, correct, because you were</p> <p>4 not --</p> <p>5 A. No. No, I was not.</p> <p>6 Q. Okay. Going back to your</p> <p>7 declaration, Mr. Coombs, the last sentence of</p> <p>8 the fourth paragraph you state that</p> <p>9 "Mr. Al-Salmi always stressed to me that an</p> <p>10 individual had to be specifically qualified</p> <p>11 for a position before they would be hired by</p> <p>12 the PCA."</p> <p>13 Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. And as you testified earlier,</p> <p>16 you had no knowledge of Mr. Omar Al-Bayoumi's</p> <p>17 qualifications, correct?</p> <p>18 A. No, I did not. I assumed he</p> <p>19 was in the States going to school.</p> <p>20 Q. Given that testimony, you have</p> <p>21 no basis to know one way or another whether</p> <p>22 Omar Al-Bayoumi was qualified for any</p> <p>23 position at PCA, correct?</p> <p>24 A. No, I had no idea at all who he</p> <p>25 was.</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Yes.</p> <p>2 Q. This refers to the logistics</p> <p>3 department budget that you were responsible</p> <p>4 for, correct?</p> <p>5 A. That's correct.</p> <p>6 Q. How many students were a part</p> <p>7 of this arrangement where the logistics</p> <p>8 department budget would be used to pay</p> <p>9 their -- pay for their studies?</p> <p>10 A. It fluctuated between 45 and</p> <p>11 50, and some of them are like interns. They</p> <p>12 would come on board temporarily in Saudi, and</p> <p>13 then they'd apply for it.</p> <p>14 They were young, and one of my</p> <p>15 job -- when I took over that job because it</p> <p>16 was a -- I was sitting in a Saudi government</p> <p>17 position. Logistics manager was not to be</p> <p>18 filled by a foreigner. I was in a Saudi</p> <p>19 government position, and we were preparing</p> <p>20 and teaching the Saudis on how to do the job.</p> <p>21 There's a lot of -- there was a lot of things</p> <p>22 fluctuating in and out.</p> <p>23 And if their name was on the</p> <p>24 list, it was already signed off on by</p> <p>25 Mohammed Al-Salmi, I signed it and forwarded</p>
<p style="text-align: right;">Page 47</p> <p>1 Q. I just want to make sure the</p> <p>2 court reporter correctly transcribed that.</p> <p>3 Your statement was, "No, I had</p> <p>4 no idea at all who he was."</p> <p>5 Was that what you said?</p> <p>6 A. I had never met him. He was</p> <p>7 just another name on the list.</p> <p>8 Q. And given that you had never</p> <p>9 met him, you had no basis one way or another</p> <p>10 to know whether he was qualified for any</p> <p>11 position at PCA, correct?</p> <p>12 A. That's correct. I had never</p> <p>13 seen a résumé. I had never seen a list of</p> <p>14 qualifications or anything. It was just his</p> <p>15 name stuck out to me when I looked down the</p> <p>16 list. It was always higher than everyone</p> <p>17 else.</p> <p>18 Q. Brian, can we please pull back</p> <p>19 up the declaration and go to page 2?</p> <p>20 In the third to the last</p> <p>21 paragraph, I want to focus on the last</p> <p>22 sentence. You state, "The budget was also</p> <p>23 used, among other things, for paying Saudi</p> <p>24 Arabian students studying abroad who were PCA</p> <p>25 employees or aspiring employees of the PCA."</p>	<p style="text-align: right;">Page 49</p> <p>1 it on to Alp Karli. And I would either take</p> <p>2 it up to Mohammed Al-Salmi or I'd take it</p> <p>3 directly to Alp Karli, but it would go --</p> <p>4 then it would go for payment.</p> <p>5 Q. You referred to a program to</p> <p>6 teach Saudis how to do certain jobs.</p> <p>7 Are you familiar with the term</p> <p>8 "Saudization"?</p> <p>9 A. Yes. Very much.</p> <p>10 Q. Was the Saudization program a</p> <p>11 program where non-Saudi workers would be</p> <p>12 replaced by Saudi workers?</p> <p>13 A. Yes.</p> <p>14 Q. A component of the Saudization</p> <p>15 program was to pay for the education of the</p> <p>16 potential replacement Saudi employees,</p> <p>17 correct?</p> <p>18 A. That's correct.</p> <p>19 Q. It was not out of the ordinary</p> <p>20 in your experience at the PCA for -- for</p> <p>21 payment for the tuition for potential Saudi</p> <p>22 replacements to be paid by PCA or Dallah</p> <p>23 Avco, correct?</p> <p>24 A. That's correct.</p> <p>25 Q. And there were in fact anywhere</p>

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<p>1 from 45 to 50 individuals who were part of</p> <p>2 the Saudization program who had their</p> <p>3 educational expenses paid for them?</p> <p>4 MR. KRY: Objection to the form</p> <p>5 of this question and the prior one.</p> <p>6 THE WITNESS: Like I said, to</p> <p>7 the best of my knowledge, it's all I</p> <p>8 saw. Okay?</p> <p>9 Other companies that I worked</p> <p>10 with over there were doing exactly the</p> <p>11 same thing.</p> <p>12 QUESTIONS BY MR. DORRIS:</p> <p>13 Q. There were other companies in</p> <p>14 Saudi Arabia who were also paying for</p> <p>15 students' tuition --</p> <p>16 A. Yes.</p> <p>17 Q. -- so they could replace</p> <p>18 non-Saudi workers, correct?</p> <p>19 A. That's correct.</p> <p>20 Q. This was a common practice not</p> <p>21 only at PCA but at other Saudi businesses,</p> <p>22 correct?</p> <p>23 A. That's correct.</p> <p>24 Q. You saw this practice</p> <p>25 throughout your time in Saudi Arabia?</p>	<p>1 A. SIYANCO.</p> <p>2 Q. Oh, SIYANCO.</p> <p>3 A. SIYANCO.</p> <p>4 Q. Okay. And SIYANCO is</p> <p>5 S-I-Y-A-N-C-O, correct?</p> <p>6 A. Yes. All capital letters.</p> <p>7 Q. What was SIYANCO?</p> <p>8 A. SIYANCO was contracted to the</p> <p>9 Saudi Ordnance, okay, and we repaired</p> <p>10 vehicles. We had mechanics come in from</p> <p>11 Italy, Germany, from the States, from</p> <p>12 Germany, all over the place, training them on</p> <p>13 how to repair vehicles and everything else.</p> <p>14 Trucks, tankers, everything.</p> <p>15 Q. And how many --</p> <p>16 A. And right --</p> <p>17 Q. How frequent was it at SIYANCO</p> <p>18 for Saudi trainees' educational expenses to</p> <p>19 be paid so that they could replace non-Saudi</p> <p>20 employees?</p> <p>21 A. Now, in SIYANCO, that was all</p> <p>22 done by the Saudi Ordnance Corps direct, not</p> <p>23 by SIYANCO, us. We knew that they were</p> <p>24 students, okay? We knew that they were</p> <p>25 going, but we never saw any of their</p>
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<p>1 A. At least in the late '80s and</p> <p>2 '90s.</p> <p>3 Q. Where else do you see this</p> <p>4 practice of Saudization where Saudi students'</p> <p>5 tuition was paid so that they could replace</p> <p>6 non-Saudi workers?</p> <p>7 A. SIYANCO-SOCP, it was a Saudi</p> <p>8 Ordnance Corps, and there were Saudis in the</p> <p>9 Saudi Ordnance Corps that we were training.</p> <p>10 Now, that was all -- all their payments were</p> <p>11 done by the Saudi Ordnance Corps. That's a</p> <p>12 job prior to when I went to Kawasaki</p> <p>13 Helicopter, the Civil Defense Aviation.</p> <p>14 Okay?</p> <p>15 And then afterwards when I went</p> <p>16 to Al-Hekma medical, I had Saudis in every</p> <p>17 department. As the operations and logistics</p> <p>18 manager, I had Saudis in every department.</p> <p>19 They were being trained for new jobs.</p> <p>20 Q. And this -- I just want to make</p> <p>21 sure I understood the name of the places</p> <p>22 where this occurred.</p> <p>23 You said Sokol {sic}?</p> <p>24 Can you spell that for the</p> <p>25 record?</p>	<p>1 expenses. We never saw any of their -- any</p> <p>2 of their provision at all.</p> <p>3 Q. Was it a frequent occurrence --</p> <p>4 A. We knew about it.</p> <p>5 Q. Sorry. Sorry for not letting</p> <p>6 you finish.</p> <p>7 Was it --</p> <p>8 A. It was a consistent occurrence.</p> <p>9 Q. Consistent occurrence. Thank</p> <p>10 you.</p> <p>11 You also mentioned this</p> <p>12 practice of Saudization occurring at Kawasaki</p> <p>13 Helicopter, and that was the position you</p> <p>14 held immediately --</p> <p>15 A. Kawasaki Helicopter?</p> <p>16 Q. Correct.</p> <p>17 A. Just prior. Okay? And that</p> <p>18 was Civil Defense Aviation, okay? And they</p> <p>19 were -- Kawasaki Helicopter built the CA46</p> <p>20 Marine helicopter. Okay? Saudis bought</p> <p>21 them.</p> <p>22 They had five -- eight bases in</p> <p>23 Saudi. Every base -- I was the manager, but</p> <p>24 I reported to the base commander. I had</p> <p>25 mechanics that were training Saudi mechanics</p>

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<p style="text-align: right;">Page 54</p> <p>1 to work on the helicopters.</p> <p>2 Q. Was it a frequent --</p> <p>3 A. It went on consistently.</p> <p>4 Q. Was it a consistent occurrence</p> <p>5 at Kawasaki Helicopter to pay Saudi trainees'</p> <p>6 educational expenses to train them to replace</p> <p>7 non-Saudi workers?</p> <p>8 A. It was not the way the defense</p> <p>9 aviation department did it. Okay?</p> <p>10 How they did that part, I don't</p> <p>11 know, because I was just managing the base</p> <p>12 and making sure those facilities were</p> <p>13 operational, making sure that the hangar was</p> <p>14 working, that they had parts, stuff like</p> <p>15 that, for the facilities. Like maintaining</p> <p>16 the base. So that didn't make it where I</p> <p>17 knew any of the details.</p> <p>18 Q. Understood.</p> <p>19 You didn't know the details of</p> <p>20 the payments, but it was your experience that</p> <p>21 it was a consistent practice to train Saudi</p> <p>22 employees to replace non-Saudi employees,</p> <p>23 correct?</p> <p>24 A. Yes.</p> <p>25 Q. Now, you also mentioned</p>	<p style="text-align: right;">Page 56</p> <p>1 name always headed the list of students</p> <p>2 contained in the financial directives because</p> <p>3 his expenses were significantly higher than</p> <p>4 the rest of the students."</p> <p>5 This refers to Omar</p> <p>6 Al-Bayoumi's living expenses, correct?</p> <p>7 A. His living expenses plus his</p> <p>8 monthly amount. I had the complete list in</p> <p>9 front of me, and his was always higher than</p> <p>10 everyone else's.</p> <p>11 Everyone -- most of the other</p> <p>12 students were four years younger than him,</p> <p>13 and he was married. None of the other</p> <p>14 students were married, and most of them lived</p> <p>15 in like a dormitory, two of them to an</p> <p>16 apartment or four to an apartment or -- but</p> <p>17 he didn't, of course. He had his wife there.</p> <p>18 Q. Like you just said, Omar</p> <p>19 Al-Bayoumi was married, correct?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know whether Omar</p> <p>22 Al-Bayoumi had any children?</p> <p>23 A. No.</p> <p>24 Q. Do you know what Omar</p> <p>25 Al-Bayoumi's actual living expenses were?</p>
<p style="text-align: right;">Page 55</p> <p>1 experiencing this at Al-Hekma.</p> <p>2 Was it a -- is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. And at Al-Hekma, was it a</p> <p>5 consistent practice to train non -- sorry, to</p> <p>6 train Saudi employees to replace non-Saudi</p> <p>7 employees?</p> <p>8 A. Yes.</p> <p>9 Q. And --</p> <p>10 A. I was training Saudis to take</p> <p>11 my position.</p> <p>12 Q. Al-Hekma --</p> <p>13 A. Al-Hekma medical.</p> <p>14 Q. At Al-Hekma, was it your</p> <p>15 experience that the training for these Saudi</p> <p>16 replacements would be paid for those Saudi</p> <p>17 replacements?</p> <p>18 A. For the most part, yes.</p> <p>19 Q. Brian, can -- or you still have</p> <p>20 it up.</p> <p>21 Can we turn to -- I want you to</p> <p>22 focus again on the declaration on the screen,</p> <p>23 Exhibit 810, page 2, and the last full</p> <p>24 paragraph of page 2.</p> <p>25 You state, "Mr. Al-Bayoumi's</p>	<p style="text-align: right;">Page 57</p> <p>1 A. What his actuals were?</p> <p>2 Q. Yeah.</p> <p>3 A. No. The amounts that were on</p> <p>4 those lists, that was on those discs that I</p> <p>5 gave to the FBI.</p> <p>6 Q. You were aware of the amount of</p> <p>7 living expenses that were paid to Omar</p> <p>8 Al-Bayoumi, correct?</p> <p>9 A. That was out of my budget, yes.</p> <p>10 Q. My question was slightly</p> <p>11 different.</p> <p>12 Omar Al-Bayoumi had expenses in</p> <p>13 his personal life. Do you know what those</p> <p>14 living expenses were?</p> <p>15 A. No.</p> <p>16 Q. Now, you mentioned that other</p> <p>17 students were typically younger and</p> <p>18 unmarried, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And you stated that most of</p> <p>21 them lived in dormitories, correct?</p> <p>22 A. Dormitories or joint apartments</p> <p>23 like that, yeah.</p> <p>24 Q. Do you know where</p> <p>25 Mr. Al-Bayoumi lived?</p>

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<p>1 A. Magdi Hanna drove me past the 2 apartment complex. I didn't see the 3 apartment that he was renting in, and it was 4 a nice -- really a nice area. He wasn't 5 living downscale.</p> <p>6 Q. Omar Al-Bayoumi --</p> <p>7 A. It was like --</p> <p>8 Q. Omar Al-Bayoumi was not living 9 in a dormitory like the other young, 10 unmarried individuals, correct?</p> <p>11 A. No. Him and his wife were 12 there together.</p> <p>13 Q. Can we turn to page 3 of the 14 declaration, Brian?</p> <p>15 Sorry, one follow-up question.</p> <p>16 You stated that you didn't know 17 what Omar Al-Bayoumi's actual living expenses 18 were in his day-to-day life, correct?</p> <p>19 A. That's correct.</p> <p>20 Q. So it's also true that you 21 don't know whether the living expenses paid 22 to him, how they related to his actual living 23 expenses in his personal life, correct?</p> <p>24 A. That's correct.</p> <p>25 Q. Now, the third full paragraph</p>	<p>1 purely your memory of an event that occurred 2 25 years ago, correct?</p> <p>3 A. The next year's budget, I saw 4 it. I remembered it. I said, wow, I wish I 5 had him, had his job. I mean, I was just 6 amazed because it had already been initialed 7 by Al-Salmi to go ahead for me to authorize 8 it to come out of my budget. It just said 9 that that -- and what Al-Salmi sent me, 10 that's what it listed as the expense, as 11 tuition. And, you know, it just -- it just 12 jumped out at me. That's all.</p> <p>13 Q. I want to turn back to the 14 process for creating your declaration.</p> <p>15 Do you understand that your 16 declaration was submitted in connection with 17 a lawsuit against Saudi Arabia by various 18 plaintiffs alleging that Saudi Arabia should 19 be held liable for the 9/11 attacks?</p> <p>20 A. Yes.</p> <p>21 Q. And as we discussed earlier, 22 prior to submitting your declaration, you 23 communicated with plaintiffs' counsel, 24 correct?</p> <p>25 A. Prior to making my declaration,</p>
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<p>1 of the declaration, you state that you recall 2 in 1996 that Al-Bayoumi received 3 approximately 60,000 per year for tuition and 4 expenses, and that amount decreased -- 5 increased by approximately \$30,000 to total 6 \$90,000 per year.</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. This occurred 25 years ago, 10 correct?</p> <p>11 A. Yes.</p> <p>12 Q. When you wrote this portion of 13 your declaration, did you base it off any 14 documents in front of you, or were you going 15 purely off your memory?</p> <p>16 A. I'm going off my memory because 17 that's what I was being paid at the time. 18 That was my base pay.</p> <p>19 Q. Your base pay was \$60,000, 20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. And your -- the next sentence, 23 the fact that -- or the statement that Omar 24 Al-Bayoumi's payments to him increased by 25 \$30,000 per year, you're basing that off</p>	<p>1 we sat down and we talked through the 2 declaration.</p> <p>3 Q. Okay.</p> <p>4 A. Okay? Based on the documents, 5 you know, that I can remember and so on.</p> <p>6 Q. How did you come to be 7 acquainted with the Kreindler & Kreindler 8 firm?</p> <p>9 A. They called me.</p> <p>10 Q. When did they call you, to the 11 best of your recollection?</p> <p>12 A. In January. In January.</p> <p>13 Q. And when they called you, what 14 did they ask of you?</p> <p>15 A. They asked me if they could 16 interview me.</p> <p>17 Q. Did they ask --</p> <p>18 A. I'm giving you the date. I 19 turned my phone --</p> <p>20 Q. What -- say that again? They 21 knew the date. I turned my phone. I didn't 22 catch that.</p> <p>23 A. I said, I'm turning my phone 24 on, and I'll give you the date they called 25 me.</p>

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<p>1 Q. Sure, go ahead. Yeah, please 2 review your phone. Can you check when they 3 called you? 4 A. Yeah. 5 It's not letting me see it. 6 Q. That's okay, Mr. Coombs. 7 Do you have any text messages 8 from the Kreindler & Kreindler firm? 9 A. Do I have any what? 10 Q. Text messages. 11 A. Just when he made an 12 appointment to see me, that's all. 13 Q. So you have some text -- 14 A. Ken Williams, he -- 15 Q. Sorry. Go ahead. Sorry for 16 interrupting you. 17 Can you please give your 18 answer? 19 A. He called me, and then I -- no, 20 he called me. I'll check that. 21 Q. When you say "he," are you 22 referring to Keith Williams or somebody else? 23 A. Yeah. 24 Q. And is it Keith or Ken 25 Williams?</p>	<p>1 submitted a declaration in this case? 2 A. Personally? Okay, I feel like 3 it's what needs to be done right. 4 Q. Did they ask you to submit a 5 declaration in this case? 6 A. They didn't ask me. They just 7 asked me if I would participate and assist, 8 and I said yes. 9 Q. You're currently represented by 10 Barb Agricola with respect to your 11 declaration, correct? 12 MS. AGRICOLA: Barbara. Not 13 Barb. 14 MR. DORRIS: Sorry. 15 MS. AGRICOLA: It's okay. 16 QUESTIONS BY MR. DORRIS: 17 Q. You're currently represented 18 Barbara Agricola, correct? 19 A. Yes. 20 Q. Has any other attorney 21 represented you in connection with your 22 declaration? 23 A. No. 24 Q. Who drafted your declaration? 25 A. Ken.</p>
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<p>1 A. Kenneth. 2 Q. Kenneth. Okay. 3 And you said that you did have 4 text messages with the Kreindler & Kreindler 5 firm for the purpose of scheduling meetings? 6 A. That's what I'm looking for. I 7 can't remember. Because he talked to me over 8 the phone quite a while. 9 Yeah, the first text message 10 was on January 1st. 11 Q. And can you read that text 12 message? 13 A. Yeah. "Good morning. Let's 14 get some breakfast before we get started. 15 Cracker Barrel, Waffle House, Huddle House, 16 Dunkin' Donuts or whatever. I will be there 17 at 8:30." 18 Q. So they approached you sometime 19 before January 1, 2021, and your first 20 meeting occurred with them on January 1, 21 2021, correct? 22 A. Yeah. 23 Q. So the Kreindler & Kreindler 24 firm interviewed you about this case. 25 How did it come to be that you</p>	<p>1 Q. So Ken provided you with a 2 draft of your declaration? 3 A. Again, I sat down and worked it 4 out word for word. 5 Q. And I'm sorry, is it Ken or 6 Keith? 7 A. Ken. 8 Q. Ken. Okay. 9 Do you have a copy of the draft 10 that was prepared by Ken? 11 A. I didn't have a copy of the 12 final. I just got it today. I just -- he 13 brought -- he brought the hard copy and I 14 initialed on it, but I didn't make a copy 15 because my printer in my -- my printer/copier 16 doesn't work at home. So I just handed it to 17 him and said, okay, go ahead. 18 Q. Did you make any edits to the 19 draft that Ken prepared? 20 A. No. 21 Q. So your declaration was drafted 22 by Ken Williams, provided to you in hard 23 copy, and you signed it as provided to you? 24 MR. HAEFELE: Objection. Form. 25 THE WITNESS: Yeah. Well,</p>

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<p>1 we -- okay. We went over it. He had</p> <p>2 a draft. Okay? We looked at it, he</p> <p>3 edited it, and then he created it, and</p> <p>4 I signed it.</p> <p>5 QUESTIONS BY MR. DORRIS:</p> <p>6 Q. How many meetings did you have</p> <p>7 where you reviewed your declaration with Ken</p> <p>8 Williams?</p> <p>9 A. From the 21st to the 25th,</p> <p>10 four, five -- yeah, five.</p> <p>11 Q. You had five meetings to review</p> <p>12 your declaration with Ken Williams?</p> <p>13 A. Yeah, just to get together.</p> <p>14 Yeah, they were short. I'm a school bus</p> <p>15 driver.</p> <p>16 Q. Okay. How long was each one of</p> <p>17 these meetings, approximately?</p> <p>18 A. Approximately an hour to two</p> <p>19 hours.</p> <p>20 Q. And you said -- you gave some</p> <p>21 dates, 21st to the 25th. You met with Ken</p> <p>22 Williams each day, the 21st through the 25th?</p> <p>23 A. Yeah.</p> <p>24 Q. So you met with Ken Williams</p> <p>25 for about an hour or two on the 21st, the</p>	<p>1 testify before the 9/11 Commission. I gave</p> <p>2 the 9/11 Commission and the FBI people the</p> <p>3 cassettes that had my spreadsheets on them</p> <p>4 because I was suspicious of the spreadsheets</p> <p>5 when I was in PCA. Something didn't seem</p> <p>6 right to me. It was out of line.</p> <p>7 When something is out of</p> <p>8 line -- I'm a retired military officer.</p> <p>9 Something is out of line, I just felt like I</p> <p>10 had to keep track of it. That's all.</p> <p>11 Q. Mr. Coombs, it would -- can</p> <p>12 you -- I know it's difficult in a deposition</p> <p>13 setting, but can you please focus on my</p> <p>14 question?</p> <p>15 My question was: On the 1st,</p> <p>16 you saw a draft of the declaration prepared</p> <p>17 by Ken Williams; is that accurate? Can you</p> <p>18 answer that question, please?</p> <p>19 A. He did an outline of a</p> <p>20 declaration, yes, but it wasn't what it ended</p> <p>21 up.</p> <p>22 Q. Okay.</p> <p>23 A. Took more meetings to complete</p> <p>24 it.</p> <p>25 Q. All right. And I'm trying to</p>
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<p>1 22nd, the 23rd, the 24th and the 25th; is</p> <p>2 that accurate?</p> <p>3 A. Well, on the 25th was</p> <p>4 finalization, and I just signed off on it. I</p> <p>5 just stopped off and had a cup of coffee and</p> <p>6 initialed off on it.</p> <p>7 Q. Now, in the process of</p> <p>8 reviewing this declaration, were there any</p> <p>9 portions of the declaration that you took</p> <p>10 out?</p> <p>11 A. Not really.</p> <p>12 Q. Were there any edit -- so you</p> <p>13 were -- on the 21st, you saw a draft of the</p> <p>14 declaration prepared by Ken Williams; is that</p> <p>15 accurate?</p> <p>16 A. No.</p> <p>17 Q. Okay. Explain to me --</p> <p>18 A. No. He started putting</p> <p>19 together pieces. I talked about, you know,</p> <p>20 going there. I talked about the other stuff,</p> <p>21 and he made a whole bunch of lists and</p> <p>22 everything. And then he had -- so I just</p> <p>23 took it from there.</p> <p>24 And I told him I had been --</p> <p>25 you know, they had flown me to New York to</p>	<p>1 understand the process by which the</p> <p>2 declaration was made. That's all I'm</p> <p>3 interested in right now.</p> <p>4 On the 21st you met with Ken</p> <p>5 Williams, and you discussed a declaration</p> <p>6 with him.</p> <p>7 Is that accurate?</p> <p>8 A. Yes, that's correct.</p> <p>9 Q. At that meeting, did he come</p> <p>10 prepared with a draft of the declaration for</p> <p>11 you to sign?</p> <p>12 A. No.</p> <p>13 Q. So you discussed with him the</p> <p>14 declaration on the 21st, correct?</p> <p>15 A. I discussed them. I showed him</p> <p>16 passports where I'd come in and out of Saudi</p> <p>17 Arabia and everything. I showed him my</p> <p>18 business cards from the Presidency of Civil</p> <p>19 Aviation, from Al-Hekma, because I had those</p> <p>20 in my personal files at home. It was about</p> <p>21 all I had.</p> <p>22 Q. When was the first time --</p> <p>23 A. And so --</p> <p>24 Q. When was the first time that</p> <p>25 Ken Williams provided you with a draft of</p>

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<p>1 your declaration?</p> <p>2 A. Probably the 22nd, 23rd. I</p> <p>3 was -- he had built a frame, and then I</p> <p>4 started talking to him about the details.</p> <p>5 Q. Now, once he provided you with</p> <p>6 a draft of the declaration, are there any</p> <p>7 other portions of the draft that he provided</p> <p>8 that you asked to be taken out of the draft?</p> <p>9 A. No.</p> <p>10 Q. Mr. Coombs, who is paying for</p> <p>11 your legal representation today?</p> <p>12 MS. AGRICOLA: I'm going to</p> <p>13 object to that.</p> <p>14 MR. DORRIS: On what grounds?</p> <p>15 On what grounds? What's the</p> <p>16 objection?</p> <p>17 THE WITNESS: I object. I'm</p> <p>18 authorized to have my own</p> <p>19 representation into a subject.</p> <p>20 QUESTIONS BY MR. DORRIS:</p> <p>21 Q. Yeah. Who is paying for your</p> <p>22 legal representation, Mr. Coombs?</p> <p>23 A. I'm a retired Title 10 federal</p> <p>24 officer, okay? Title 10.</p> <p>25 Q. Are you paying for --</p>	<p>1 your representation?</p> <p>2 A. Kinder and Kinder {sic}.</p> <p>3 Q. That's Kreindler & Kreindler?</p> <p>4 A. Yeah.</p> <p>5 Q. Okay. Have you received any</p> <p>6 compensation or other reimbursement from</p> <p>7 plaintiffs' counsel for anything you have</p> <p>8 done in connection with your declaration?</p> <p>9 A. No. Not a penny.</p> <p>10 Q. Okay. Brian, can you pull up</p> <p>11 Tab 19 and mark it as Exhibit 814?</p> <p>12 (Coombs Exhibit 814 marked for</p> <p>13 identification.)</p> <p>14 QUESTIONS BY MR. DORRIS:</p> <p>15 Q. Mr. Coombs, have you seen this</p> <p>16 document before?</p> <p>17 A. Notice of deposition? Yeah.</p> <p>18 Q. Okay. Can we please turn to</p> <p>19 the last page of this document?</p> <p>20 Do you see the heading titled</p> <p>21 "Document Requests"?</p> <p>22 A. Yeah.</p> <p>23 Q. And you see two requests</p> <p>24 underneath that?</p> <p>25 A. Yes.</p>
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<p>1 A. I just told you --</p> <p>2 Q. Are you paying --</p> <p>3 A. I just told you --</p> <p>4 Q. I'm sorry, sir. Go ahead.</p> <p>5 A. I just told you, I am not</p> <p>6 obligated to answer that question.</p> <p>7 Q. If there's no objection, you</p> <p>8 are obligated to answer the question.</p> <p>9 A. Okay. I'll tell you what. Is</p> <p>10 this the last step? Is this the last step?</p> <p>11 Q. Is this the last step? I'm not</p> <p>12 sure what you're referring to.</p> <p>13 A. Okay. Why are you asking that</p> <p>14 question?</p> <p>15 Q. Mr. Coombs, the deposition</p> <p>16 format really has me ask the questions. I</p> <p>17 believe it's clearly relevant to bias of the</p> <p>18 witness, including any payments you're</p> <p>19 receiving, so it's obviously relevant.</p> <p>20 MR. POUNIAN: Objection to the</p> <p>21 form.</p> <p>22 QUESTIONS BY MR. DORRIS:</p> <p>23 Q. And I'll ask the question</p> <p>24 again.</p> <p>25 Mr. Coombs, who is paying for</p>	<p>1 Q. Have you undertaken any effort</p> <p>2 to search for all communications with</p> <p>3 plaintiffs during the relevant time period</p> <p>4 relating to the actions?</p> <p>5 A. No.</p> <p>6 Q. Do you have any communications</p> <p>7 with plaintiffs during the relevant time</p> <p>8 period relating to the actions?</p> <p>9 A. No.</p> <p>10 Q. I believe we just discussed</p> <p>11 that you have some text messages with the</p> <p>12 plaintiffs; is that correct?</p> <p>13 A. I have the text messages for</p> <p>14 the meetings. That's all.</p> <p>15 Q. Okay. Do you have --</p> <p>16 A. They're not relative to the</p> <p>17 statements.</p> <p>18 Q. Apart from text messages with</p> <p>19 the Kreindler & Kreindler firm, do you have</p> <p>20 any e-mails with the Kreindler & Kreindler</p> <p>21 firm?</p> <p>22 A. No.</p> <p>23 Q. Okay. So you have some text</p> <p>24 messages and no e-mails; is that accurate?</p> <p>25 A. I just have text messages here</p>

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<p style="text-align: right;">Page 74</p> <p>1 that show where we were meeting and at what 2 time. 3 Q. Okay. Do you have any hardcopy 4 documents exchanged with the Kreindler & 5 Kreindler firm? 6 A. They made copies of my business 7 cards. They made copies of front pages of my 8 passport, and that was it. To show the 9 cover -- that was it. 10 Q. In your meetings with Ken -- in 11 your meetings with Ken Williams, did you 12 retain any hardcopy documents? Any notes, 13 any papers, anything he provided to you? 14 A. No. 15 Q. Now, for Request Number 2, did 16 you search for all documents relating to any 17 declarations that you have signed related to 18 the actions, including, but not limited to, 19 any drafts, outlines or summaries of such 20 declarations? 21 A. I went online and looked at the 22 9/11 Commission statement, and that was all I 23 looked at, referencing my name in that 9/11 24 Commission outline. 25 I just looked at it online. I</p>	<p style="text-align: right;">Page 76</p> <p>1 at 1:02 p.m. 2 (Off the record at 1:02 p.m.) 3 VIDEOGRAPHER: Back on the 4 record at 1:19 p.m. 5 MR. DORRIS: Good news for you, 6 Mr. Coombs. I have no further 7 questions. Thank you for your time. 8 CROSS-EXAMINATION 9 QUESTIONS BY MR. KRY: 10 Q. Mr. Coombs, my name is Robert 11 Kry. I'm one of the lawyers that represents 12 Dallah Avco in this case, and so I have some 13 questions for you as well. 14 If we could put back up on the 15 screen your declaration, which was previously 16 marked Exhibit 810. 17 In the second paragraph, you 18 state, "I first applied to work at Dallah 19 Avco in 1983 and began working for them in 20 Jeddah, Saudi Arabia, in 1983 as a chief 21 procurement officer at the King Khalid 22 Military City." 23 Mr. Coombs, how long did you 24 work at the King Khalid Military City? 25 A. I was only up there until --</p>
<p style="text-align: right;">Page 75</p> <p>1 did not print it. Shut it back down because 2 it didn't cover enough information. 3 Q. Do you have any copies -- 4 A. That was the only research -- 5 Q. Sorry. Sorry to interrupt. 6 Do you have any copies of any 7 drafts, outlines or summaries of the 8 declaration that you prepared? 9 A. No. 10 Q. Do you -- when you met with Ken 11 Williams, did you jot down any notes on a 12 notepad and keep those? 13 A. No. 14 MR. DORRIS: We've been going 15 for about an hour and a half. I think 16 now is a good time for a quick break. 17 And just for your -- for 18 everybody's benefit, I may have a few 19 additional questions, but I don't 20 anticipate going much longer. 21 MR. KRY: Just to be clear, 22 we'll have some pretty extensive 23 questions after Dan's done on behalf 24 of Dallah Avco. 25 VIDEOGRAPHER: Off the record</p>	<p style="text-align: right;">Page 77</p> <p>1 about ten months. I got it set up and 2 everything, and they turned it over to a guy 3 from the US Army Corp of Engineers. And I 4 had trained everybody, wrote out all their 5 initial procedures and everything, got it set 6 up, and I came back -- and came back to the 7 States. 8 Q. And did that job relate to 9 Civil Aviation in any way? 10 A. No, that -- that was -- it was 11 King Khalid Military City. It was a base up 12 there by Hafar Al-Batin. It was a military 13 base that they launched out into Iraq. It 14 had tanks. It had Air Force. It had 15 everything. And basically, I was helping 16 them finalize the support element. 17 Q. Are you sure that that -- 18 A. Go ahead. 19 Q. Are you sure that that position 20 was with Dallah Avco as opposed to a 21 different company within the broader Dallah 22 group of companies? 23 A. No. It was Dallah Avco out of 24 Houston, Texas, and then I went to -- to 25 Dallah. I lived -- I was paid by Dallah in</p>

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<p>1 Jeddah. Sheik Saleh Kamel, the originator, 2 was still there. 3 I went from there, as a part of 4 the initial team, into Hafar Al-Batin because 5 they had hired me to set things up. I was 6 the chief of procurement for about ten 7 months. I got everything set up, and then 8 the contract that they offered me after that 9 was considerably less, and so I came back 10 home. 11 Q. You referred in your answer to 12 Dallah Avco out of Houston, Texas. 13 Are you referring to Avco 14 Overseas? 15 A. Yeah. Yeah. 16 Q. Do you know whether Avco 17 Overseas has a subcontractor relationship 18 with Dallah Avco or a corporate affiliate 19 relationship to Dallah Avco? 20 A. At that time it seemed to me 21 like Saleh Kamel was very close connected. 22 He was way above me in understanding that 23 portion. 24 When I came back to the States, 25 I actually out-processed in Houston.</p>	<p>1 within the AED." 2 Are those statements accurate? 3 A. That is totally accurate. 4 Q. Who did you submit your 5 application to? 6 A. I submitted the application to 7 Dallah. 8 Q. Who interviewed you? 9 A. I took my résumé up there. 10 Q. Who interviewed -- 11 A. They -- 12 Q. I apologize for interrupting. 13 Who interviewed you for the 14 position at the PCA? 15 MR. POUNIAN: Objection to 16 form. 17 THE WITNESS: I don't remember. 18 They just -- they just knew that they 19 needed a logistics, and I was 20 qualified. I had a -- I had a good 21 work record with them from before, and 22 basically I went in, was with them for 23 an hour, and I was hired. 24 QUESTIONS BY MR. KRY: 25 Q. Do you know whether someone at</p>
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<p>1 Q. Did you have any firsthand 2 knowledge of the nature of the corporate 3 affiliation relationship, if any, between 4 Avco Overseas and Dallah Avco and how that 5 might have changed over the years? 6 Is that a no? 7 A. I knew there was changes -- I 8 knew there was changes going on because they 9 were visible. I didn't have any -- I didn't 10 know how it was going on inside. 11 Q. Okay. And other than that ten 12 months -- other than the ten months at King 13 Khalid Military City, did you ever work for 14 any Dallah entity between when you left King 15 Khalid and when you started work at the PCA 16 in 1994? 17 A. No. 18 Q. Further down in your 19 declaration you state, "In the summer 20 of 1994, I visited Dallah Avco and became 21 aware that Dallah Avco was recruiting for 22 positions within the Saudi Arabia Presidency 23 of Civil Aviation's Airways Engineering 24 department. I applied for and received a 25 position as assistant logistical manager</p>	<p>1 the PCA had to ultimately approve your 2 hiring? 3 A. No, I don't. 4 Q. In your declaration, the next 5 few sentences state, "Within a few months, my 6 immediate supervisor resigned, and I was 7 appointed manager of the logistics department 8 of AED. I stayed in this position until 9 leaving the Presidency of Civil Aviation in 10 June 1997." 11 Is that all accurate? 12 A. That is 100 percent accurate. 13 Q. What was the name of the 14 immediate superior who resigned? 15 A. I can't remember. 16 Q. Would it -- 17 A. He was retired military, and 18 that's all -- I can't remember. I'm sorry. 19 Q. That's fine. 20 Do you recognize the name A.L. 21 Jones? 22 A. Yeah, there it is. Got it. 23 Q. That was him? 24 A. Yeah. Okay. 25 Q. And was he the logistics</p>

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<p style="text-align: right;">Page 82</p> <p>1 manager before you -- you took over that 2 position in 1995? 3 A. Yes. Yes. 4 Q. Do you know who took over as 5 logistics manager after you left in 1997? 6 A. Yes. Tom Wallace. 7 Q. Back to your declaration. A 8 little bit later it states, "I was paid by 9 Dallah Avco, though I had no other 10 substantial contact with Dallah Avco aside 11 from people working for the AED who were also 12 recruited by Dallah Avco. All of my 13 day-to-day duties were as manager of 14 logistics for the PCA/AED." 15 Are those statements accurate? 16 A. Accurate. 17 Q. So is it correct that you had 18 no substantial contacts with Dallah Avco, 19 other than your paycheck, while you were 20 working as logistics manager at Airways 21 Engineering? 22 A. True. 23 Q. Did anyone from Dallah Avco 24 direct or supervise your day-to-day work at 25 Airways Engineering?</p>	<p style="text-align: right;">Page 84</p> <p>1 Are those statements all 2 accurate? 3 A. That's correct. 4 Q. Was Al-Salmi in fact your boss? 5 A. Yes. 6 Q. And did Al-Salmi direct and 7 supervise your day-to-day work at Airways 8 Engineering? 9 A. He directed me -- basically he 10 would call me in and talk to me about what he 11 wanted done, and then he'd just turn me 12 loose. I was kind of independent. 13 But, yes, if something was 14 outside of the norm, I did go clear it with 15 him. 16 Q. Did Al-Salmi evaluate your job 17 performance at Airways Engineering? 18 A. Yes. 19 Q. Did Al-Salmi play a role in 20 setting your salary and benefits at Airways 21 Engineering? 22 A. I'm sure he did, because I had 23 no idea how it was done. 24 I just know that I got an 25 increment in my contract, said that I would</p>
<p style="text-align: right;">Page 83</p> <p>1 A. No way. No. 2 Q. Do you know whether the PCA 3 ultimately reimbursed Dallah Avco for the 4 salary that you received from Dallah Avco? 5 A. They -- as a part of the 6 contract that they had with Dallah, which I 7 was under, I did a timesheet every month, 8 just like everybody else did, and it 9 processed and then they paid me. 10 Q. Right. 11 So I understand that Dallah 12 Avco processed your paycheck and issued -- 13 A. Yeah. 14 Q. -- a salary to you. 15 My question is, do you know one 16 way or the other whether the PCA reimbursed 17 Dallah Avco for those salary payments? 18 A. It's a part of the contract. 19 I'm sure they did. 20 Q. Back to the declaration. The 21 next paragraph states, "My boss was Mohammed 22 Al-Salmi, AED's director general. Al-Salmi 23 approved all of my vacation and personal 24 leave as well as anything else related to my 25 job duties and administrative procedures."</p>	<p style="text-align: right;">Page 85</p> <p>1 get so much. It was in my contract. 2 Q. On the next page of your 3 declaration, there's a paragraph that says, 4 "All of PCA's offices and warehouses in 5 Jeddah were located within the same PCA 6 complex. The main AED office was located 7 directly across the street from my office at 8 the AED logistics department. I visited the 9 various AED offices as my job 10 responsibilities required me to do so." 11 Are those statements all 12 accurate? 13 A. That's correct. That's 14 correct. 15 Q. When you were a logistics 16 manager at Airways Engineering, did you work 17 in one of the Airways Engineering offices at 18 the PCA? 19 A. I was only in the logistics 20 building. I -- yes, it was one of their 21 offices, but it was the building -- I wasn't 22 in the headquarters building. I was in, 23 like, the building that had a warehouse off 24 to the side. We had offices on the end, and 25 the rest of it was warehouses.</p>

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<p style="text-align: right;">Page 86</p> <p>1 Q. So I understand that building</p> <p>2 is not PCA headquarters, but is it still a</p> <p>3 PCA office building?</p> <p>4 A. Yes. Yeah.</p> <p>5 Q. Are you aware that Dallah Avco</p> <p>6 had its own corporate offices, separate from</p> <p>7 the PCA's Airways Engineering offices?</p> <p>8 A. Yes, they had the tower just up</p> <p>9 the road.</p> <p>10 Q. Did you ever do any of your</p> <p>11 day-to-day work for Airways Engineering from</p> <p>12 Dallah Avco's corporate offices?</p> <p>13 A. No.</p> <p>14 Q. Okay. I'm going to put up a</p> <p>15 different exhibit. This one was previously</p> <p>16 marked Anqari Exhibit 369, produced at</p> <p>17 KSA3168.</p> <p>18 This is an organization chart</p> <p>19 that the Kingdom produced in this litigation</p> <p>20 for the PCA's Airways Engineering</p> <p>21 directorate. And if you look at the chart,</p> <p>22 there's a box at the top labeled "Director -</p> <p>23 General Airways Engineering."</p> <p>24 Was that the position that</p> <p>25 Mohammed Al-Salmi held at the PCA?</p>	<p style="text-align: right;">Page 88</p> <p>1 Have you heard of something</p> <p>2 called the Air Navigation System Support</p> <p>3 project, or ANSS project?</p> <p>4 A. That was something that was</p> <p>5 underway, that they were structuring while I</p> <p>6 was there, but I never had any details.</p> <p>7 Q. Do you know whether the ANSS</p> <p>8 project was the government contract under</p> <p>9 which Dallah Avco provided recruiting and</p> <p>10 payroll services for Airways Engineering?</p> <p>11 A. No.</p> <p>12 (Coombs Exhibit 815 marked for</p> <p>13 identification.)</p> <p>14 QUESTIONS BY MR. KRY:</p> <p>15 Q. All right. I'm going to put up</p> <p>16 another document. We will mark this one as</p> <p>17 Exhibit 815. It's produced at DA10695.</p> <p>18 This is an October 23, 1995</p> <p>19 letter from Al-Salmi at Airways Engineering</p> <p>20 to Magdi Hanna at Ercan, Incorporated,</p> <p>21 listing some purchase requests together with</p> <p>22 some attachments.</p> <p>23 One of the requests listed here</p> <p>24 is PR number 76224. You can see it as</p> <p>25 number 9.</p>
<p style="text-align: right;">Page 87</p> <p>1 A. Yes. Yes.</p> <p>2 Q. At the bottom of the chart</p> <p>3 there's a box labeled "Logistics Manager."</p> <p>4 Was that the unit that you</p> <p>5 managed from 1995 to 1997?</p> <p>6 A. Yes.</p> <p>7 Q. And then at the side of the</p> <p>8 chart on the right, there's a box labeled</p> <p>9 "Contracts and Finance Control."</p> <p>10 And do you know who managed</p> <p>11 that unit in the 1995 --</p> <p>12 A. Alp Karli. Alp Karli.</p> <p>13 Q. Does this chart correctly</p> <p>14 reflect that as logistics manager you</p> <p>15 reported to Al-Salmi?</p> <p>16 A. Yes.</p> <p>17 Q. And does the chart correctly</p> <p>18 reflect that Alp Karli, as the head of the</p> <p>19 CFC, reported to Al-Salmi?</p> <p>20 A. Yes.</p> <p>21 Q. A bit earlier you testified</p> <p>22 that Dallah Avco recruited you to work at</p> <p>23 Airways Engineering and that Dallah Avco</p> <p>24 processed your payroll at Airways</p> <p>25 Engineering.</p>	<p style="text-align: right;">Page 89</p> <p>1 I'm going to ask you some</p> <p>2 questions about this particular purchase</p> <p>3 request just to better understand the</p> <p>4 logistics department's procurement process,</p> <p>5 but just to be clear, I don't think there's</p> <p>6 anything special about this particular</p> <p>7 request. We just picked it as an example.</p> <p>8 So if we can go first to the</p> <p>9 attachment to this document at page 10716,</p> <p>10 this is a Presidency of Civil Aviation</p> <p>11 purchase requisition. At the top left, the</p> <p>12 document has the requisition number, PR</p> <p>13 76224, and at the top right there's a date</p> <p>14 prepared of October 18, 1995.</p> <p>15 And if you look at the body of</p> <p>16 the requisition, there's some items listed</p> <p>17 which include 10 disc drive upper heads, 10</p> <p>18 disc drive lower heads, and then the next</p> <p>19 page, 10 disc plotters.</p> <p>20 Do you recall seeing documents</p> <p>21 like this purchase requisition when you</p> <p>22 worked as logistics manager?</p> <p>23 A. Yes, I had to sign them.</p> <p>24 Q. Would this type of document be</p> <p>25 used to initiate the procurement process at</p>

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<p style="text-align: right;">Page 90</p> <p>1 Airways Engineering?</p> <p>2 A. I would sign it and Al-Salmi</p> <p>3 would sign it, and then we would process it.</p> <p>4 Q. Was the purpose of this</p> <p>5 document to initiate the procurement process</p> <p>6 when Airways Engineering needed to obtain</p> <p>7 parts or other goods or services?</p> <p>8 A. Yes.</p> <p>9 Q. Who would decide what parts</p> <p>10 Airways Engineering needed to purchase</p> <p>11 through this process?</p> <p>12 A. We had a department -- we set</p> <p>13 up -- we have so many pieces of equipment,</p> <p>14 and you have to have parts for each piece of</p> <p>15 equipment. So the maintenance people would</p> <p>16 put in requests, and based on demand and</p> <p>17 turnover, we would order parts for stockage,</p> <p>18 okay, which would be a stock level. And then</p> <p>19 sometimes if it was high priority, that meant</p> <p>20 that the equipment was down, and so it would</p> <p>21 process quicker and I'd hand-carry it</p> <p>22 through.</p> <p>23 But this is normal, and this</p> <p>24 was processed through to order parts from the</p> <p>25 States for the equipment that is physically</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. The individuals that would put</p> <p>2 in those requests to have these forms</p> <p>3 prepared, would those be other employees at</p> <p>4 the PCA?</p> <p>5 A. Yeah, but they were mechanics</p> <p>6 and people working in the shops and things</p> <p>7 like that.</p> <p>8 Q. Right.</p> <p>9 In the middle of the document,</p> <p>10 there's a line labeled "approved" that lists</p> <p>11 Mohammed Basharahil, yourself and Al-Salmi.</p> <p>12 Do you recognize Al-Salmi's</p> <p>13 signature on the document?</p> <p>14 A. Yes. He's to the right, I'm in</p> <p>15 the center, and Mohammed was a part of the</p> <p>16 administrative side of things on the supply</p> <p>17 side.</p> <p>18 Q. And so you recognize your</p> <p>19 signature in the middle of that document</p> <p>20 there?</p> <p>21 A. Yes, that's my signatures.</p> <p>22 Q. Do you recognize Mohammed</p> <p>23 Basharahil's signature on the left?</p> <p>24 A. Yes.</p> <p>25 Q. Was he part of the logistics</p>
<p style="text-align: right;">Page 91</p> <p>1 in Saudi Arabia. And we'd process it, they</p> <p>2 would buy it, they would ship it, then I'd</p> <p>3 get a customs clearance form pre-arrival in</p> <p>4 Saudi Arabia.</p> <p>5 Then I would take that over to</p> <p>6 the -- to Dallah because they had a customs</p> <p>7 team. And they would pick it up and deliver</p> <p>8 it to us when it arrived.</p> <p>9 Q. You referred to maintenance</p> <p>10 people that would put in requests like these.</p> <p>11 Are those maintenance people</p> <p>12 other --</p> <p>13 A. Well, they don't put them in.</p> <p>14 They put the -- it's like they're step one.</p> <p>15 They fill out a small request form, and it</p> <p>16 goes to the clerks, okay, the administrative</p> <p>17 portion of stockage, ordering spare parts.</p> <p>18 Okay. From ordering spare</p> <p>19 parts, then they look and see how many they</p> <p>20 need, and then they make a purchase order for</p> <p>21 what they need.</p> <p>22 Then they -- we process that</p> <p>23 from the administrative side of logistics,</p> <p>24 okay? We would process it for it to be</p> <p>25 ordered to the contractor.</p>	<p style="text-align: right;">Page 93</p> <p>1 department, or was he in a different PCA</p> <p>2 department?</p> <p>3 A. Oh, he was a part of the</p> <p>4 logistics department, but he would -- because</p> <p>5 he was fluent, very fluent, in several</p> <p>6 dialects of Arabic, very fluent in English</p> <p>7 and everything, he was sort of a go-between.</p> <p>8 I'd send him out to do some things, you know,</p> <p>9 I'd send him out to London. I'd send him out</p> <p>10 to, you know, other places because he was</p> <p>11 very efficient at doing it.</p> <p>12 Q. So he would report to you when</p> <p>13 you were the logistics manager?</p> <p>14 A. Yes.</p> <p>15 Q. Who would actually prepare the</p> <p>16 information that we see on this form listing</p> <p>17 the specific parts that need to be ordered?</p> <p>18 Would that be one of you in the logistics</p> <p>19 department or would it be one of the other</p> <p>20 PCA employees that submitted the request that</p> <p>21 you mentioned earlier?</p> <p>22 A. It's one of the clerks in the</p> <p>23 supply -- basically the supply office would</p> <p>24 prepare the request from a -- a handwritten</p> <p>25 request, whatever they get from the</p>

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<p>1 mechanics.</p> <p>2 You see, if they need -- if</p> <p>3 they need a part, an electronic item, then</p> <p>4 they would -- the mechanic -- the people</p> <p>5 doing the repairs would write up a request</p> <p>6 for the part, would go to his supervisor.</p> <p>7 Then he would bring it in to Mohammed's</p> <p>8 department, the supply -- the supply</p> <p>9 department.</p> <p>10 They'd put it together, okay,</p> <p>11 identify it. Then they'd give it to me, and</p> <p>12 I'd sign off on it. Then go to Mohammed</p> <p>13 Al-Salmi, sign off on it, and then it would</p> <p>14 go to the -- to the contractor.</p> <p>15 Q. Okay. With regard to those</p> <p>16 first steps where the mechanics and the</p> <p>17 clerks would submit this information, to your</p> <p>18 knowledge, did anyone at Dallah Avco have any</p> <p>19 role in submitting that information about</p> <p>20 what parts needed to be purchased?</p> <p>21 A. No.</p> <p>22 Q. And then at the stage of the</p> <p>23 process where Al-Salmi, you and Basharahil</p> <p>24 sign off on this purchase requisition, did</p> <p>25 anyone at Dallah Avco have any role in --</p>	<p>1 would anyone at Dallah Avco have any role in</p> <p>2 the stage of the process where purchasing PCA</p> <p>3 logistics receives a copy of the --</p> <p>4 A. No. No.</p> <p>5 Q. Okay.</p> <p>6 A. No.</p> <p>7 Q. So we'll turn now back to the</p> <p>8 first page of the document, which is DA10695.</p> <p>9 This is the letter dated October 23, 1995,</p> <p>10 two days later, from Al-Salmi to Magdi Hanna</p> <p>11 at Ercan.</p> <p>12 It states, "Enclosed please</p> <p>13 find the following purchase requests for</p> <p>14 procurement action" against the indicated</p> <p>15 document numbers. One of those is PR 76224,</p> <p>16 the one for the disc drive components we were</p> <p>17 just looking at.</p> <p>18 Do you recognize Al-Salmi's</p> <p>19 signature on this document?</p> <p>20 A. Yes, absolutely.</p> <p>21 Q. Next to --</p> <p>22 A. Guess what?</p> <p>23 Q. Next to --</p> <p>24 A. Look down at the lower right</p> <p>25 hand. I mean, left hand --</p>
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<p>1 A. No, not -- no.</p> <p>2 Q. Okay. At the bottom right</p> <p>3 there's a stamp that says, "Received,</p> <p>4 purchasing PCA logistics" dated October 21,</p> <p>5 1995, which is three days after the purchase</p> <p>6 requisition was dated.</p> <p>7 Does that stamp indicate that</p> <p>8 the requisition was sent to PCA -- excuse me,</p> <p>9 purchasing PCA logistics after you and</p> <p>10 Al-Salmi approved it?</p> <p>11 A. Yes.</p> <p>12 Q. Is the purchasing PCA logistics</p> <p>13 also a component of Airways Engineering?</p> <p>14 A. It just meant that it was</p> <p>15 cleared to be purchased. That's all.</p> <p>16 Q. And to your knowledge, did</p> <p>17 Dallah Avco have any role in that step of the</p> <p>18 process?</p> <p>19 A. Yes. A lot of this stuff they</p> <p>20 already had. They may have some in stock or</p> <p>21 whatever like that, but the -- Alp Karli</p> <p>22 would take boxes of these things over, they'd</p> <p>23 take a look at them, and then they would go</p> <p>24 off to contractors and whatever like that.</p> <p>25 Q. Other than Alp Karli, though,</p>	<p>1 Q. I was just about to ask.</p> <p>2 Do you see your initials there?</p> <p>3 A. Those are my initials.</p> <p>4 Q. Do those initials indicate that</p> <p>5 you prepared this document for Al-Salmi to</p> <p>6 sign?</p> <p>7 A. That indicates that -- yes.</p> <p>8 Q. Who selected which vendor would</p> <p>9 receive a purchase request like this?</p> <p>10 A. It was based on the -- they had</p> <p>11 a list of manufacturers and everything. If</p> <p>12 the parts came out of the States, it would go</p> <p>13 to who was supporting us in the States. So</p> <p>14 it would go to Ercan, and then Ercan would</p> <p>15 purchase it in the States. If it was like in</p> <p>16 England, then it would be processed --</p> <p>17 they -- they had other departments to process</p> <p>18 it through.</p> <p>19 Q. And in selecting that vendor,</p> <p>20 is that something you would personally decide</p> <p>21 or would it be decided by people acting under</p> <p>22 your direction?</p> <p>23 A. No. No, it was -- this would</p> <p>24 be a list of the equipment he was supporting.</p> <p>25 Okay? In other words, this stuff came from</p>

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<p style="text-align: right;">Page 98</p> <p>1 the States. The equipment was from the 2 States. Okay? 3 If it was from England, then 4 they had a separate operation for England. 5 Okay? I can't remember the name of it. 6 But -- off the top of my head right now, I'm 7 sorry, I can't remember. But each one would 8 be processed to the supplier of the country. 9 We had suppliers in Italy. We 10 had suppliers in France. We had suppliers in 11 Germany and Italy. It was all over the 12 place. 13 Q. So my question, though, is, 14 if -- so if you had a purchase requisition 15 that you had approved for a particular 16 component like disc drive upper/lower heads, 17 who was responsible for looking at these 18 vendor lists and identifying the vendor that 19 would supply those parts? 20 A. You take the part and the 21 country that it came from, and that's how it 22 was determined. It was determined. It 23 wasn't selected. It was determined that the 24 parts came -- the equipment came from this 25 country, so they got the contract. Because</p>	<p style="text-align: right;">Page 100</p> <p>1 it. 2 (Coombs Exhibit 816 marked for 3 identification.) 4 QUESTIONS BY MR. KRY: 5 Q. All right. Let's take a look 6 at another document which we will mark as 7 Exhibit 816, produced at DA10334. 8 This is a February 22, 1997 9 request for payment letter from you, Samuel 10 G. Coombs, to Fareed Bogary at Dallah Avco, 11 together with some attachments again. And 12 the body of the letter indicates that it 13 relates to PR number 76224, which is the 14 same -- the same purchase requisition we were 15 just looking at. 16 A. Yes. 17 Q. We're going to turn, first of 18 all, to DA10338. 19 Do you recognize this as the 20 exact same document we were just looking at, 21 the purchase requisition from -- 22 A. Yes. 23 Q. Okay. And then we'll turn next 24 to page DA10335. 25 This is an invoice from Ercan</p>
<p style="text-align: right;">Page 99</p> <p>1 it's more efficient than going through 2 another party to then get to them and then 3 come to us, because then you're adding 4 another step to the process. 5 Q. Okay. To your knowledge, did 6 Dallah Avco have any role in identifying 7 particular vendors that should receive 8 purchase requests like these? 9 A. In some cases they did, if they 10 had somebody that was doing the support 11 element. 12 It wasn't anything I could 13 call. Sometimes it would change. 14 Q. Would that be -- would that 15 happen most of the time or would that be an 16 unusual occurrence? 17 A. No, it was -- it was an 18 intermediate {sic} thing. It just depended 19 on the availability of the equipment and the 20 supplies. We contact them and said, we need 21 this, and they said, well, we don't have it. 22 Then we put out a request to 23 find out where it was and then issue a 24 purchase order -- order based on that. 25 Request for quote. That's how we would do</p>	<p style="text-align: right;">Page 101</p> <p>1 for PR number 76224, listing the same disk 2 drive components that were on the purchase 3 requisition. 4 At the top right, there's a 5 line that says, "Date shipped, March 29, 6 1996." 7 What do you understand that 8 that date to refer to? 9 A. The date shipped is from them 10 to -- that was the date shipped from the US. 11 Q. At the top left -- at the top 12 left -- 13 A. Yeah. 14 Q. At the top left the invoice 15 says, "Sold and shipped to Dallah Avco Trans 16 Arabia, Presidency of Civil Aviation, Airways 17 Engineering ANSS III program, PO Box 15441." 18 Do you recognize that PO Box 19 address as the Airways Engineering offices 20 where you worked? 21 A. Yes. I don't remember the 22 number, but it is there, yeah. 23 Q. If we can just flip up to the 24 first page of the document for a moment. 25 At the very bottom line, do you</p>

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<p style="text-align: right;">Page 102</p> <p>1 see it says, "Please reply to director 2 general Airways Engineering, PO Box 15441"? 3 Does that refresh your 4 recollection that that is the PO box for the 5 Airways Engineering? 6 A. Yeah. 7 Q. In the body of the invoice on 8 page 10355, there's a unit price of \$895 and 9 a total price of \$27,520. 10 To your knowledge, who 11 determined what price Ercan would charge for 12 parts like these? 13 A. Off the top of my head, it was 14 a cost-plus process. 15 Q. So to your knowledge, did 16 Dallah Avco have any role in determining the 17 prices that Ercan put on its invoices? 18 A. No. 19 Q. At the bottom of the invoice 20 there's a stamp that says, "Approved for 21 payment, PR 76224." 22 Do you see your initials on 23 that stamp? 24 A. Yeah. 25 Q. Does that indicate that you had</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. Okay. Based on the dates, it 2 seems like there were some pretty significant 3 delays both before Ercan issued its invoice 4 and before the PCA received those parts. 5 Were delays like those common 6 in your experience, working with vendors like 7 Ercan? 8 A. Well, it may not -- go up to 9 the page with the stamp on it. 10 Q. Does the invoice -- 11 A. Right there. That's customs 12 clearance right there. 13 Q. Okay. 14 A. See that, that stamp on there? 15 Go back down. Go back down. No, stop right 16 there. 17 Where it says "receiving" and 18 that stamp on there, that means that it went 19 through customs. 20 Q. Okay. So it may take some time 21 for part shipments like these to go through 22 customs? 23 A. Yeah. In other words, it was 24 picked up from customs on 2/16. That custom 25 stamp had to be on there, okay, for us to get</p>
<p style="text-align: right;">Page 103</p> <p>1 approved payment of this invoice? 2 A. That meant that it had arrived, 3 that it had -- had come into the warehouse, 4 and then I just -- {audio interruption} -- 5 stamp on it and go. 6 Q. Did Dallah Avco have any role 7 in that step of the process where you -- 8 A. Oh, no, huh-uh. 9 Q. We'll turn next to page 10 DA10336. This is a Presidency of Civil 11 Aviation material receiving report -- 12 A. Yes. 13 Q. -- for PR 76224. It includes a 14 few signatures dated February 16, 1997. And 15 if we go down to the second page, we can see 16 that the receiving report relates to the same 17 parts, the ten disc drive upper heads, ten 18 disc lower heads and ten disc plotters. 19 Would PCA employees fill out 20 this material receiving report once they 21 actually received shipment of the parts? 22 A. When the parts came to the 23 warehouse, the receiving in the warehouse 24 would break them down and pass it off. And 25 basically they'd say, okay, we got this.</p>	<p style="text-align: right;">Page 105</p> <p>1 it. It had to go through Saudi customs. 2 Q. Okay. Finally, we'll turn back 3 to the first page, which was DA10334. This 4 is the request for payment letter that you, 5 Samuel Coombs, sent to Fareed Bogary at 6 Dallah Avco on February 22, 1997, six days 7 after the material receiving report. 8 And it says, "Please provide 9 payment of US dollar \$27,520.96 to our 10 vendor, Ercan, Inc., against the following 11 document," and then it lists the PR 12 number 76224. 13 Do you recognize your signature 14 at the bottom of this document? 15 A. Yes, that's my signature. 16 Q. And below that are the initials 17 MB. 18 Do you recognize those as 19 Mohammed Basharahil's initials? 20 A. Yes. 21 Q. Was one of Dallah Avco's 22 responsibilities to pay subcontractor 23 invoices like this one from Airways 24 Engineering? 25 A. Depending on how they worked --</p>

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<p style="text-align: right;">Page 106</p> <p>1 see, after I signed off on this and</p> <p>2 everything, it would go to Alp Karli. Or if</p> <p>3 Mohammed Al-Salmi was available, I'd take it</p> <p>4 to him and then he'd give it to Karli.</p> <p>5 Q. And once Alp Karli or Al-Salmi</p> <p>6 had received the document, would it be sent</p> <p>7 to Dallah Avco?</p> <p>8 A. And then he would take it to</p> <p>9 Dallah. He'd go to the Dallah tower.</p> <p>10 Q. And Dallah tower, is that where</p> <p>11 Fareed Bogary had his offices?</p> <p>12 A. Have you ever seen the Dallah</p> <p>13 building in Jeddah, Saudi Arabia?</p> <p>14 Q. I have.</p> <p>15 A. Huh?</p> <p>16 Q. I have, actually.</p> <p>17 A. Okay. That's the reason I call</p> <p>18 it the Dallah tower.</p> <p>19 Q. Very good.</p> <p>20 A. All their administrative</p> <p>21 offices and everything else were in the</p> <p>22 tower.</p> <p>23 Q. To your knowledge, when Dallah</p> <p>24 Avco received a request for payment like this</p> <p>25 from Airways Engineering, did Dallah Avco</p>	<p style="text-align: right;">Page 108</p> <p>1 identification.)</p> <p>2 QUESTIONS BY MR. KRY:</p> <p>3 Q. We'll take a look at another</p> <p>4 exhibit. We'll mark this one Exhibit 817,</p> <p>5 produced at KSA2127.</p> <p>6 This is an excerpt from the</p> <p>7 financial condition section of the contract</p> <p>8 between Dallah Avco and the PCA called the</p> <p>9 ANSS 4 contract, and we'll look at, in</p> <p>10 particular, Section 3-3-1-1 on page KSA2135.</p> <p>11 That provision is titled</p> <p>12 "Entitlement," and it says, "The contractor</p> <p>13 shall be entitled each month to be paid for</p> <p>14 logistics support purchases made during</p> <p>15 previous months and for special cost items as</p> <p>16 described in Section 4, scope of services,</p> <p>17 Article 4-3."</p> <p>18 Is that provision consistent</p> <p>19 with your understanding that Dallah Avco was</p> <p>20 entitled to be reimbursed by the PCA for the</p> <p>21 vendor invoices that it paid?</p> <p>22 A. Yes.</p> <p>23 Q. All right. During your</p> <p>24 testimony earlier today, you had mentioned</p> <p>25 that -- well, no, strike that.</p>
<p style="text-align: right;">Page 107</p> <p>1 have any responsibility for reviewing or</p> <p>2 auditing the reasonableness of the prices</p> <p>3 that were reflected on the invoices?</p> <p>4 A. No. No.</p> <p>5 Q. Did Dallah Avco have any</p> <p>6 responsibility for reviewing or auditing</p> <p>7 whether Airways Engineering actually needed</p> <p>8 the goods or services that were reflected on</p> <p>9 the invoices?</p> <p>10 A. No.</p> <p>11 Q. Did Dallah Avco have any</p> <p>12 responsibility for reviewing or auditing</p> <p>13 Airways Engineering's selection of a vendor</p> <p>14 to provide those goods and services?</p> <p>15 A. No.</p> <p>16 Q. Was Dallah Avco's job</p> <p>17 essentially just to pay the invoices</p> <p>18 according to the terms that Airways</p> <p>19 Engineering had approved?</p> <p>20 A. Yes.</p> <p>21 Q. To your knowledge, was Dallah</p> <p>22 Avco entitled to be reimbursed by the PCA</p> <p>23 after it paid a vendor invoice like this one?</p> <p>24 A. Yeah.</p> <p>25 (Coombs Exhibit 817 marked for</p>	<p style="text-align: right;">Page 109</p> <p>1 (Coombs Exhibit 818 marked for</p> <p>2 identification.)</p> <p>3 QUESTIONS BY MR. KRY:</p> <p>4 Q. We'll mark as Exhibit 818 a</p> <p>5 document produced at DA10725.</p> <p>6 This is a different and</p> <p>7 unrelated purchase request from Al-Salmi to</p> <p>8 Ercan dated September 26, 1995, and I'm going</p> <p>9 to turn to one of the purchase requisitions</p> <p>10 that's on page DA10731.</p> <p>11 Do you recognize your signature</p> <p>12 on this document?</p> <p>13 A. Yes.</p> <p>14 Q. So this purchase requisition</p> <p>15 is -- lists items described as Defense</p> <p>16 Language Institute. And if we scroll to the</p> <p>17 third page of the requisition, it identifies</p> <p>18 the manufacturer as Defense Language</p> <p>19 Institute, English Language Center, based at</p> <p>20 Lackland Air Force base in Texas.</p> <p>21 Do you remember sending</p> <p>22 requisitions for educational materials from</p> <p>23 the English Language Center in Texas during</p> <p>24 your time at logistics?</p> <p>25 A. I used to call them sidebars.</p>

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<p style="text-align: right;">Page 110</p> <p>1 In other words, that was something that --</p> <p>2 they were paying for something, and I</p> <p>3 wouldn't even know what it was, but it was</p> <p>4 given to me to do it.</p> <p>5 Q. When you received purchase</p> <p>6 requisitions like this, did you think there</p> <p>7 was anything inappropriate about the PCA</p> <p>8 using logistics funds for English language</p> <p>9 education materials?</p> <p>10 A. I didn't ask questions about</p> <p>11 it. I just -- I just knew that they were</p> <p>12 going to do it whether I approved or not.</p> <p>13 Inside the Presidency of Civil</p> <p>14 Aviation, there was direct payments all over</p> <p>15 the world that I had no clue. What was</p> <p>16 inside my department I could do. If it came</p> <p>17 in direct -- and Mohammed would come in with</p> <p>18 a handful of them, and he'd say, we got to</p> <p>19 process this. And we weren't getting</p> <p>20 anything in logistics for it.</p> <p>21 Q. When you saw a requisition like</p> <p>22 this that related specifically to English</p> <p>23 language education materials, did you have</p> <p>24 concerns that there was something illegal</p> <p>25 with processing a purchase requisition for</p>	<p style="text-align: right;">Page 112</p> <p>1 worked before. They were all connected.</p> <p>2 Some of the stuff would just come in, and I'd</p> <p>3 just do it.</p> <p>4 Q. My question is, were English</p> <p>5 language skills a helpful qualification for</p> <p>6 certain individuals who worked at the PCA?</p> <p>7 A. Yeah.</p> <p>8 MR. CARTER: Objection to form.</p> <p>9 QUESTIONS BY MR. KRY:</p> <p>10 Q. And so at the time did you</p> <p>11 perceive that there was something</p> <p>12 inappropriate about the PCA funding education</p> <p>13 skills that were going to be relevant to the</p> <p>14 job qualifications of the people that work</p> <p>15 there?</p> <p>16 A. It was normally the younger</p> <p>17 students that didn't speak any Arabic, and</p> <p>18 they would like -- just down the road where</p> <p>19 I'm at is Fort Benning, Georgia. They'd send</p> <p>20 them money to pay for the students to be</p> <p>21 trained there, the Saudi students there.</p> <p>22 Okay?</p> <p>23 Where are you at?</p> <p>24 You know, they -- there's</p> <p>25 schools in all of the military bases here in</p>
<p style="text-align: right;">Page 111</p> <p>1 materials like this?</p> <p>2 MR. CARTER: Objection to form</p> <p>3 and foundation.</p> <p>4 THE WITNESS: I was so used to</p> <p>5 seeing it, it was normal. Okay?</p> <p>6 Because they would give gifts. A</p> <p>7 gift, money under the table. Okay?</p> <p>8 Called baksheesh in Arabic. This was</p> <p>9 normal. They may be paying for</p> <p>10 somebody to get in, that they wanted</p> <p>11 in.</p> <p>12 So we just processed it. We</p> <p>13 didn't question it.</p> <p>14 QUESTIONS BY MR. KRY:</p> <p>15 Q. Would English language skills</p> <p>16 be an important job qualification for PCA</p> <p>17 employees or prospective PCA employees?</p> <p>18 A. Well, see, you'll notice this</p> <p>19 is an Air Force base. Okay? And the Saudi</p> <p>20 Air Force and folks were all connected,</p> <p>21 because the Presidency of Civil Aviation was</p> <p>22 right down the street. Saudi Air Force was</p> <p>23 under them.</p> <p>24 And then on the other side of</p> <p>25 them was Kawasaki Helicopter, where I had</p>	<p style="text-align: right;">Page 113</p> <p>1 the States that train foreign military in the</p> <p>2 United States, and that can be what that was.</p> <p>3 I didn't question -- I didn't</p> <p>4 question it.</p> <p>5 Q. Right.</p> <p>6 And you didn't see any reason</p> <p>7 to question it because it wasn't anything</p> <p>8 that you --</p> <p>9 A. Yes.</p> <p>10 Q. Did you believe that there was</p> <p>11 anything improper with the PCA funding</p> <p>12 English studies education for its own</p> <p>13 employees?</p> <p>14 A. No.</p> <p>15 Q. To your knowledge, who decided</p> <p>16 to spend Airways Engineering logistics' funds</p> <p>17 on English language educational materials</p> <p>18 like these?</p> <p>19 MR. CARTER: Objection to form.</p> <p>20 THE WITNESS: Normally it</p> <p>21 was -- normally it was the Presidency</p> <p>22 of Civil Aviation down to Al-Salmi,</p> <p>23 who was assigned above him.</p> <p>24 QUESTIONS BY MR. KRY:</p> <p>25 Q. And to your knowledge, did</p>

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<p style="text-align: right;">Page 114</p> <p>1 Dallah Avco have any role in deciding to 2 spend logistics' funds on English language 3 education materials? 4 A. No, not that I know of. 5 MR. KRY: All right. Why 6 don't -- how long have we been going 7 for? 8 VIDEOGRAPHER: 42 minutes. 9 MR. KRY: Okay. We can keep 10 going. 11 Do you need a break, or are you 12 going to keep going, Mr. Coombs? 13 THE WITNESS: Keep going. 14 QUESTIONS BY MR. KRY: 15 Q. Great. 16 Let's put up a document that 17 was previously marked Exhibit 812. This is 18 DA2267, the March 30, 1994 letter from 19 Al-Salmi to Avco Overseas in Texas. 20 A. Yes. 21 Q. It says, "You are hereby" -- 22 I'm sorry. It says, "You are requested to 23 pay the tuition for Mr. Omar Al-Bayoumi of US 24 \$4,430 to the American Language Institute." 25 And then it says, "In addition,</p>	<p style="text-align: right;">Page 116</p> <p>1 signature at the bottom of the document? 2 A. Yes, that's Al-Salmi's 3 signature. 4 Q. And down and to the left there 5 are some initials which are hard to see, but 6 to me it looks like a A on top of a J. 7 Do you recognize those as the 8 initials of A.L. Jones? 9 A. Alp Karli. It looks like Alp 10 Karli. 11 Q. You think those are Alp Karli's 12 initials? 13 A. Yeah. 14 Q. Okay. In your declaration, you 15 mentioned that there were financial 16 directives, was the term you used, that 17 Al-Salmi would periodically send directing 18 the payment of educational expenses for PCA 19 employees. 20 Is this letter an example of 21 one of those financial directives that you 22 were referring to? 23 A. Yes. 24 Q. And to your knowledge, did 25 Dallah Avco have any role in preparing</p>
<p style="text-align: right;">Page 115</p> <p>1 you are requested to pay weekly living 2 allowance up to 30 weeks of US \$600 to 3 Mr. Al-Bayoumi and invoice the ANSS III 4 project account." 5 I think you testified earlier 6 that this letter is dated March 30, 1994, 7 which is before you began work at Airways 8 Engineering; is that correct? 9 A. Yeah. 10 Q. Is that a yes? 11 A. Yes. 12 Q. Have you seen this document 13 before today? 14 A. No. 15 Q. Is that a no? Unfortunately, 16 we need to get yeses or nos for the record. 17 A. No. 18 Q. And we mentioned Avco Overseas 19 a bit earlier. 20 Do you recall them as a former 21 subcontractor for Airways Engineering? 22 A. They were a subcontractor 23 through Dallah Avco. 24 Q. Right. 25 Do you recognize Al-Salmi's</p>	<p style="text-align: right;">Page 117</p> <p>1 financial directives like this one? 2 A. No. 3 Q. Earlier today you testified 4 that when Dallah Avco settled payments for 5 invoices for expenses like this, it would 6 either pay the funds from Jeddah to a US bank 7 or it would handle the payment through -- and 8 then you referred to something called the 9 American side of Dallah Avco. 10 When you used that term, were 11 you referring to Avco Overseas? 12 A. Well, yeah. See, I -- I called 13 them Dallah Avco because that was who I had 14 originated with, and then they cut it off to 15 Avco. But my thinking was still that way. 16 And I'm sorry I said it that 17 way, but it was Avco Overseas Services, yes. 18 Q. Okay. Let's put up a document 19 previously marked Al-Bayoumi Exhibit 726, 20 produced at DA2281. 21 This is a fax from Al-Salmi to 22 Avco Overseas dated September 10, 1994, and 23 it states, "Request you pay Mr. Omar 24 Al-Bayoumi in advance all his weekly living 25 allowances instead of three installments and</p>

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<p style="text-align: right;">Page 118</p> <p>1 invoice the ANSS III project account." 2 Is this another example of a 3 financial directive from Al-Salmi? 4 A. Yes. 5 Q. Do you recognize Al-Salmi's 6 signature at the bottom? 7 A. Yes, and my initials. 8 Q. And in addition to your 9 initials, do you also recognize Mohammed 10 Basharahil's initials? 11 A. Yes. 12 Q. Did you prepare this document 13 for Al-Salmi to sign? 14 A. No. It was normally prepared 15 over at the headquarters and then given to us 16 because we had to cost it out of our budget. 17 Q. Do you have any recollection of 18 this specific document? 19 A. No. 20 Q. Do you know why Al-Salmi wanted 21 Omar Al-Bayoumi to be paid all his weekly 22 living allowances in advance rather than in 23 three installments? 24 A. No, but -- it's just 25 favoritism. I'm sorry, but it's favoritism.</p>	<p style="text-align: right;">Page 120</p> <p>1 Do you recognize Al-Salmi's 2 signature at the bottom of this document? 3 A. Yes, and my initials, too. 4 Q. Did you prepare this document 5 for Al-Salmi to sign? 6 A. No. 7 Q. Do you know who prepared it? 8 A. I don't remember who prepared 9 it. I think it was -- no, I don't remember. 10 Q. The letter refers to a team 11 that Airways Engineering sent to evaluate the 12 potential replacements for Avco Overseas. 13 Do you recall being a part of 14 that team? 15 A. See, that was one of the things 16 that I went to -- yes, I was a part of the 17 team. I went to Louisville, Kentucky, okay? 18 I went to Atlanta, went to New York, went to 19 Chicago. There were several companies that 20 we searched out all over the States. 21 Q. And was that a team of 22 individuals from Airways Engineering? 23 A. It would normally be a team of 24 four people. 25 Q. Which four people were those?</p>
<p style="text-align: right;">Page 119</p> <p>1 And if it was like this, we did it. 2 (Coombs Exhibit 819 marked for 3 identification.) 4 QUESTIONS BY MR. KRY: 5 Q. Let's mark as Exhibit 819 a 6 document produced at DA10842. 7 This is an October 27, 1994 8 letter from Al-Salmi at the PCA to Samir 9 Magboul at Dallah Avco. And it states, 10 "Pursuant to your memo of the 3rd of August, 11 1994, this office dispatched a team to 12 evaluate several prospective companies in the 13 United States of America to replace Avco 14 Overseas Services of Houston, Texas. 15 "Upon completion of our 16 evaluation, it was decided Ercan Consulting 17 Engineers of Newport Beach has the present 18 ability to provide PCA Airways Engineering 19 with needed spare parts, equipment and 20 personnel. 21 "To this end, please effect 22 procedures to close out Avco Overseas 23 Services and transfer their responsibility of 24 spare parts procurement and personnel 25 recruitment to Ercan Consulting Engineers."</p>	<p style="text-align: right;">Page 121</p> <p>1 A. Normally myself and three 2 Saudis. 3 Q. Would Alp Karli be a member of 4 that team with you? 5 A. No, Alp -- Hamad Al-Rashid 6 would go with me, and I can't remember -- it 7 would fluctuate on the others depending on 8 who was available and their expertise. 9 Q. Do you know who made the 10 decision that Ercan would replace Avco 11 Overseas as the subcontractor? 12 A. I have no idea. 13 Q. To your knowledge, did Dallah 14 Avco have any role in deciding to have Ercan 15 replace Avco Overseas Services? 16 A. I don't know. 17 Q. Do you know if Dallah Avco in 18 fact recommended that the PCA should engage a 19 different company instead? 20 A. I wasn't in the inner side of 21 that. I didn't -- I don't know how it came 22 about. 23 (Coombs Exhibit 820 marked for 24 identification.) 25</p>

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<p style="text-align: right;">Page 122</p> <p>1 QUESTIONS BY MR. KRY: 2 Q. Let's mark as Exhibit 820 a 3 document produced at DA10841. This was 4 previously marked as Kamel Exhibit 110, but 5 this is a more legible copy and also includes 6 a translation. 7 This is a letter from Al-Salmi 8 to Samir Magboul at Dallah Avco dated 9 6/6/1415 on the Hijri calendar, which 10 corresponds to November 10, 1994, concerning 11 contract to Ercan Consulting Engineers. 12 Do you recognize Al-Salmi's 13 signature at the bottom of that letter? 14 A. Yes. 15 Q. And below the signature, if we 16 can zoom -- 17 A. Below the signature, Alp Karli 18 to the left and my initials to the right. 19 Q. Okay. The third paragraph 20 states, "In light of the above, the following 21 Airways Engineering personnel will represent 22 this office during the contract and 23 changeover from Avco Overseas Services to 24 Ercan Consulting Engineers," and then it 25 lists four people: Hamad Al-Rashid, Alp</p>	<p style="text-align: right;">Page 124</p> <p>1 Avco have any role in directing your 2 activities on this trip? 3 A. No. 4 Q. Earlier today we looked at some 5 financial directives that Al-Salmi sent to 6 Avco Overseas directing it to pay education 7 and living expenses to Al-Bayoumi. 8 After Ercan took over as 9 subcontractor for Avco Overseas, did Al-Salmi 10 issue similar financial directives to Ercan 11 directing it to pay Al-Bayoumi's education 12 and living expenses? 13 A. Yes, yes. 14 Q. Did you ever see a letter from 15 Al-Salmi directing Ercan to make those 16 payments? 17 A. I saw two, but -- I remember it 18 coming across my desk. That's all I 19 remember. 20 Q. Do you remember the approximate 21 time frame when you saw those letters? 22 A. It was after I had gone out to 23 visit them. 24 Q. Would it have been in the 1995 25 time frame?</p>
<p style="text-align: right;">Page 123</p> <p>1 Karli, yourself and Najib Mustafa. 2 Who was Hamad Al-Rashid? 3 A. Hamad Al-Rashid was -- he 4 worked over at the main building. He was 5 responsible for the contracts for all the 6 compounds where we had the navigation systems 7 all around the Kingdom, and he was 8 responsible for the maintenance of the 9 fencing and, you know, things like that. And 10 he would normally buy large quantities of, 11 like, fencing, you know, roofing, air 12 conditioners, stuff like that. 13 Q. Was he a civil servant at the 14 PCA? 15 A. Pardon? 16 Q. Was he a civil servant at the 17 PCA? 18 A. Yes, he was definitely that. 19 Q. And what about Najib Mustafa, 20 was he another civil servant at the PCA? 21 A. Yes. 22 Q. Did anyone from Dallah Avco 23 accompany the four of you on this trip? 24 A. No. 25 Q. To your knowledge, did Dallah</p>	<p style="text-align: right;">Page 125</p> <p>1 A. I think so, yeah. 2 Q. Do you have any role in 3 preparing or approving those two letters? 4 A. No. 5 Q. Do you know who prepared those 6 letters? 7 A. I'm not really sure. It could 8 have been Alp Karli or -- no, I can't 9 remember. 10 Q. Were both letters over 11 Al-Salmi's signature? 12 A. Yes. 13 Q. To your knowledge, did Ercan in 14 fact make the payments for education and 15 living expenses to Al-Bayoumi that were 16 directed in those letters? 17 MR. DORRIS: Objection to form. 18 THE WITNESS: I'm certain they 19 did. 20 QUESTIONS BY MR. KRY: 21 Q. Do you know why Al-Salmi 22 arranged for subcontractors like Avco 23 Overseas and Ercan to pay education and 24 living expenses rather than just paying those 25 expenses from the PCA directly?</p>

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<p style="text-align: right;">Page 126</p> <p>1 A. Convenience. It was quicker. 2 Q. Why is that -- 3 A. Sometimes -- sometimes the 4 internal process could take as much as two 5 months if it was paid to -- so he would pass 6 it off to the contractors to pay it and then 7 pay the commission. 8 Q. Were there any other reasons 9 why it was more convenient to have the 10 expenses paid through subcontractors rather 11 than directly from the PCA? 12 A. Like I said, the improvement 13 process for the government itself to send the 14 money was a very long process. Okay? If 15 they had to go to the Presidency of Civil 16 Aviation. So he ran most of the stuff 17 through subcontractors because it was 18 quicker. 19 Q. All right. Let's take a look 20 again at your declaration, please, which was 21 marked Exhibit 810. 22 Page 2 of that declaration 23 says, "The logistics budget" -- there it is. 24 "The logistics department budget was used for 25 the purchase of equipment and logistical</p>	<p style="text-align: right;">Page 128</p> <p>1 California. I don't know what he was 2 studying. 3 Q. Do you know whether he was 4 studying something? 5 A. No. 6 Q. Do you know whether -- well, 7 strike that. 8 Did you ever learn any 9 information that caused you to doubt that 10 Al-Salmi {sic} was pursuing some sort of 11 educational studies in the United States? 12 A. I didn't doubt it, you know, 13 but everybody said he was in school, so I 14 just didn't question it. 15 Q. When you say "everybody said he 16 was in school," who are you referring to as 17 "everybody"? 18 A. The people talking around 19 the -- inside the -- you know, like when 20 they said, yeah, he's in the States. You 21 know, I'd ask a question, and they'd say, 22 yeah, he's in the States going to school. 23 Q. Approximately how many people 24 made comments like that to you? 25 A. Four or five. You know, Alp</p>
<p style="text-align: right;">Page 127</p> <p>1 support for the numerous aeronautical 2 navigation systems located throughout the 3 Kingdom of Saudi Arabia. The navigational 4 systems were for both aircraft and 5 ground-based systems such as air traffic 6 control towers. The budget was also used, 7 among other things, for paying Saudi Arabian 8 students studying abroad who were PCA 9 employees or aspiring employees of the PCA." 10 A. Yeah. 11 Q. Is that all accurate? 12 A. Yes. 13 Q. Was Al-Bayoumi an example of 14 one of those PCA employees studying abroad? 15 A. Yes. 16 Q. And were the financial 17 directives that Al-Salmi sent to Avco 18 Overseas and Ercan examples of Al-Salmi using 19 the logistics budget to pay Saudi Arabian 20 students studying abroad who were PCA 21 employees or aspiring employees of the PCA? 22 A. Yes. Yes. 23 Q. Do you know whether Al-Bayoumi 24 was in fact studying abroad? 25 A. Well, I know that he was in</p>	<p style="text-align: right;">Page 129</p> <p>1 Karli and Hamad Rashid -- Hamad Al-Rashid. 2 There's several of them that would say things 3 like that to me. So I just quit asking. 4 Q. And at any time did anyone tell 5 you that Al-Bayoumi actually was not pursuing 6 educational studies in the United States? 7 A. No. 8 Q. Did anyone tell you whether 9 Al-Bayoumi's studies in the United States 10 were related to his job skills or 11 qualifications at the PCA? 12 A. No. 13 Q. To your knowledge, did anyone 14 at Dallah Avco have any role in deciding to 15 use logistics funds to fund the educational 16 payments for Saudi students that you referred 17 to in your declaration? 18 A. No. No. 19 Q. On page 3 of the declaration, 20 you say that "Mr. Al-Bayoumi regularly 21 claimed unusual additional expenses that were 22 not provided to other students. I can recall 23 payments for his wife's frequent travel to 24 and from Saudi Arabia and the United States. 25 Also, on one occasion I saw a request that</p>

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<p style="text-align: right;">Page 130</p> <p>1 Mr. Al-Bayoumi wanted to get one new car for 2 himself so that his wife could take 3 possession of his car that was only a year 4 old." 5 In what sense were those 6 expenses unusual in your view? 7 A. Well, the other students didn't 8 have cars. 9 Q. Was there any other respect in 10 which the expenses were unusual? 11 A. It just seemed that, you 12 know -- I told him that Mr. Al-Salmi had to 13 approve that. I didn't have the authority 14 to. 15 Q. So is it fair to say that the 16 reason you considered the expenses unusual 17 was just that they were -- gave Al-Bayoumi a 18 higher standard of living than the other 19 Saudi students that were being funded through 20 logistics? 21 A. Yes. 22 Q. Other than travel expenses for 23 Al-Bayoumi's wife to go back and forth to 24 Saudi Arabia and the new car so that 25 Al-Bayoumi's wife could use his old car, do</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. To your knowledge, would Dallah 2 Avco have had any authority to refuse to pay 3 a logistics invoice from Airways Engineering 4 just because Dallah Avco had made its own 5 determination that particular expenses were 6 too high? 7 MR. DORRIS: Objection. Form. 8 THE WITNESS: No, not if they 9 were signed off on, no, they couldn't. 10 QUESTIONS BY MR. KRY: 11 Q. At any time did you ever learn 12 that Al-Bayoumi was using his educational 13 funding to plan terrorist attacks or engage 14 in other criminal activity in the United 15 States? 16 A. No. No. 17 Q. At any time did you even 18 suspect that Al-Bayoumi was using his 19 educational funding to plan terrorist attacks 20 or engage in other criminal activity in the 21 United States? 22 A. No. 23 Q. If you had learned that 24 Al-Bayoumi was using his student funding to 25 plan terrorist attacks or engage in other</p>
<p style="text-align: right;">Page 131</p> <p>1 you recall any other specific examples of 2 Al-Bayoumi's expenses that you considered 3 unusual? 4 A. I couldn't detail it, but I 5 just thought that they were all quite high. 6 That's all. 7 Q. My only question is, are there 8 any specific expenses that you recall 9 standing out as being qualitatively unusual, 10 other than the travel for Mr. Al-Bayoumi's 11 wife back to Saudi Arabia and the new car for 12 Al-Bayoumi? 13 A. No. 14 Q. Did you ever complain to 15 Al-Salmi that Al-Bayoumi's expenses were 16 unusual? 17 A. Yes, and I got corrected. 18 Q. What did Al-Salmi tell you? 19 A. What he told me is, he said, 20 that's not for you to worry about. 21 Q. Did you ever complain to Dallah 22 Avco that Al-Bayoumi's expenses were unusual? 23 A. No. Dallah was the 24 subcontractor. I didn't talk to them about 25 that.</p>	<p style="text-align: right;">Page 133</p> <p>1 criminal activity, would you have reported 2 that information to Al-Salmi? 3 A. I first would have gone to the 4 military attache at the embassy, and then I 5 would have reported it to him. 6 Q. Would you have reported that 7 information to law enforcement? 8 A. Not directly. Military attache 9 at the US Embassy would be who I would 10 contact first. 11 Q. Would you understand that they 12 would report the information to law 13 enforcement as appropriate? 14 A. Through the chain of command, 15 yes, they would. 16 Q. Okay. Okay. We are going to 17 need to go on the FBI record for the next few 18 exhibits. If we can ask the tech to remove 19 anyone who's not cleared for FBI documents 20 from the room, please, and let me know when 21 we're ready. 22 VIDEOGRAPHER: I have the six 23 counsel who are not cleared in the 24 breakout room. 25 ***BEGIN FBI CONFIDENTIAL PORTION***</p>

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<p style="text-align: right;">Page 134</p> <p>1 (Coombs Exhibit 821 marked for 2 identification.) 3 QUESTIONS BY MR. KRY: 4 Q. So we will mark as Exhibit 821 5 a document produced at [REDACTED]. This is the 6 FBI's summary of an interview that occurred 7 on -- an interview that occurred with you on 8 April 3, 2002. 9 First of all, Mr. Coombs, have 10 you seen these FBI summaries of their 11 interviews with you? 12 A. No, I haven't seen this. 13 Q. Okay. Do you recall giving a 14 number of interviews to the FBI back in 2002 15 and 2004? 16 A. Yes. Yeah, my -- Tom Wallace, 17 who replaced me, went with me over there. 18 Q. Okay. [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>	<p style="text-align: right;">Page 136</p> <p>1 employees" and "students" to refer to the 2 same people? 3 A. Yes. 4 Q. [REDACTED] 5 [REDACTED], did 6 you mean that they were being paid to pursue 7 educational studies rather than being paid to 8 perform other types of work at Airways 9 Engineering? 10 A. I saw some of the students come 11 back and never go to work. That was the 12 reason I started calling them ghost 13 employees, the students. 14 Q. With respect to the -- what 15 they were doing during the time that they 16 were having their educational studies funded, 17 did you understand that they were actually 18 pursuing educational studies? 19 A. I couldn't tell from my end. 20 Q. Did you ever have a basis for 21 saying that [REDACTED] during 22 the time period that they were supposed to be 23 pursuing educational studies? 24 A. I didn't know. [REDACTED] 25 [REDACTED]</p>
<p style="text-align: right;">Page 135</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] Omar 4 Al-Bayoumi was one of these ghost employees. 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 Do you recall providing that 10 information to the FBI during your April 2002 11 interview? 12 A. Yes. 13 Q. [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 A. Yes. 18 Q. And are those ghost employees 19 the same individuals you referred to in your 20 declaration when you said that Al-Salmi had 21 used the logistics budget that pays Saudi 22 Arabian students studying abroad who were PCA 23 employees or aspiring employees of the PCA? 24 A. Yes. 25 Q. So you used the terms "ghost</p>	<p style="text-align: right;">Page 137</p> <p>1 [REDACTED] 2 Q. Right. 3 So setting aside what they may 4 have done after they came back to Saudi 5 Arabia, during -- during the time that those 6 individuals were outside the Kingdom in other 7 countries, did you have any firsthand 8 knowledge of whether they were pursuing 9 educational studies [REDACTED]? 10 A. No. 11 Q. [REDACTED] 12 [REDACTED] 13 [REDACTED] And I think we discussed 14 earlier that Avco Overseas was a 15 subcontractor of Dallah Avco. 16 Do you recall that testimony? 17 A. Yes. 18 Q. [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 A. [REDACTED] 25 [REDACTED]</p>

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1 [REDACTED]
 2 [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 Q. Okay. Do you recall testifying
 6 earlier that you didn't have any firsthand
 7 knowledge, though, of whether that was just a
 8 subcontractor relationship or a -- some sort
 9 of corporate affiliation?
 10 A. No, I didn't have any firsthand
 11 knowledge of it myself. It was secondhand.
 12 Q. [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 Do you recall making that
 18 statement to the FBI?
 19 A. [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 Q. Okay. So apart from the --
 25 A. And then -- it's hard to

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1 remember. I just can't remember all the
 2 details.
 3 Q. That's fine.
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED], is the rest of that
 7 sentence consistent with your recollection of
 8 what you told the FBI?
 9 A. Yeah, that's what -- see, when
 10 I would talk to Al-Salmi about things, he
 11 would, you know -- he would correct me, and I
 12 would settle down. I knew better than to
 13 confront him if there was a question. I
 14 questioned things, and when I would
 15 questioned it, I would get -- I never went
 16 back. I just left it alone.
 17 Q. [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 A. [REDACTED]
 22 Q. Did Al-Salmi ever tell you that
 23 Dallah Avco wanted Al-Bayoumi to stay in
 24 America?
 25 A. No.

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1 Q. Did Al-Salmi ever tell you that
 2 Bayoumi was not a student?
 3 A. Say again?
 4 Q. Did Al-Salmi ever tell you that
 5 Bayoumi was not a student?
 6 A. No.
 7 Q. [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 My question is, do you have any
 17 personal knowledge at all about [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 A. [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 Q. [REDACTED]
 25 [REDACTED]

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1 [REDACTED]
 2 A. [REDACTED]
 3 Q. [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 A. [REDACTED]
 17 Q. [REDACTED]
 18 [REDACTED]
 19 A. [REDACTED]
 20 Q. [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

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<p style="text-align: right;">Page 142</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 And then dropping down a couple 8 of sentences, it says, "In April of 2000, the 9 other allowance jumps to 14,271 riyals and 10 stays at that level until December 2000." 11 Do you remember discussing 12 those other allowances with the FBI? 13 A. No, I didn't -- I didn't even 14 know the numbers. 15 Q. Okay. And in fact, April 2000 16 is three years after you left the company, 17 right? 18 A. Yeah. Yes. 19 Q. And I think you testified 20 earlier that the -- the department of the PCA 21 that would be responsible for setting 22 salaries and allowances for project employees 23 was a different department of the Airways 24 Engineering than your logistics department; 25 is that right?</p>	<p style="text-align: right;">Page 144</p> <p>1 Q. [REDACTED] 2 [REDACTED] 3 A. [REDACTED] 4 [REDACTED] 5 Q. [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 A. [REDACTED] 10 [REDACTED] 11 Q. [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 A. [REDACTED] 15 Q. [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 A. [REDACTED] 19 Q. [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 A. [REDACTED] 23 [REDACTED] 24 Q. [REDACTED] 25 [REDACTED]</p>
<p style="text-align: right;">Page 143</p> <p>1 A. Yes. 2 Q. All right. We'll take that 3 down. 4 (Coombs Exhibit 822 marked for 5 identification.) 6 QUESTIONS BY MR. KRY: 7 Q. And we'll mark as Exhibit 822 a 8 document produced at [REDACTED]. This is a 9 summary of another interview that you had 10 with the FBI that took place on July 16, 11 2002. 12 On page 1, the second paragraph 13 states, [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 A. [REDACTED] 21 Q. [REDACTED] 22 A. [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>	<p style="text-align: right;">Page 145</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED], is that based on any 4 personal knowledge that you have? 5 A. [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 Q. [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 A. [REDACTED] 21 Q. All right. [REDACTED] 22 [REDACTED] 23 [REDACTED] -- do you have any 24 personal knowledge that [REDACTED] 25 [REDACTED]</p>

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<p style="text-align: right;">Page 146</p> <p>1 [REDACTED] 2 [REDACTED] 3 A. [REDACTED] 4 Q. [REDACTED] 5 [REDACTED] 6 A. [REDACTED] 7 Q. [REDACTED] 8 [REDACTED] 9 A. [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 Q. [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 A. [REDACTED] 18 [REDACTED] 19 Q. [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>	<p style="text-align: right;">Page 148</p> <p>1 [REDACTED] 2 [REDACTED] 3 Is that statement accurate? 4 A. Yes. 5 (Coombs Exhibit 823 marked for 6 identification.) 7 QUESTIONS BY MR. KRY: 8 Q. All right. We'll mark as 9 Exhibit 823 a document produced at [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 Is that statement accurate? 21 A. Yes. 22 Q. [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>
<p style="text-align: right;">Page 147</p> <p>1 [REDACTED] 2 [REDACTED] 3 My question is, do you have any 4 personal knowledge of any facts showing that 5 [REDACTED] 6 [REDACTED]? 7 A. Not directly. 8 Q. So in this memo you 9 characterized your belief as speculation. 10 Is that an accurate 11 description? 12 A. Yes, it was speculation. 13 Q. Later on this page, the report 14 says, [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 A. Yes. 22 Q. Is that statement accurate? 23 A. Yes. 24 Q. [REDACTED] 25 [REDACTED]</p>	<p style="text-align: right;">Page 149</p> <p>1 [REDACTED] 2 A. No. 3 (Coombs Exhibit 824 marked for 4 identification.) 5 QUESTIONS BY MR. KRY: 6 Q. And the last document. We'll 7 mark this as Exhibit 824, I believe. This is 8 produced at [REDACTED]. [REDACTED] 9 [REDACTED] the FBI summary of 10 your first interview that we looked at at the 11 very beginning of this line of questioning, 12 dated April 3, 2002. 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 And if you look down at 19 subsequent pages of this version of the 20 summary, [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 A. No, I didn't even...</p>

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<p style="text-align: right;">Page 150</p> <p>1 Q. All right. We can take that 2 document down. Just a couple last few 3 questions. 4 MR. DORRIS: Before -- I don't 5 think the court reporter got the 6 entire answer to that question. 7 "No, I didn't even" -- it 8 trailed off. I just couldn't hear. 9 MR. KRY: Was that the correct 10 recording of your answer, Mr. Coombs? 11 I think the transcript's 12 accurate. 13 MR. DORRIS: Okay. 14 ***END FBI CONFIDENTIAL PORTION*** 15 QUESTIONS BY MR. KRY: 16 Q. Mr. Coombs, throughout your 17 time at Airways Engineering, did you 18 understand that Omar Al-Bayoumi was pursuing 19 educational studies in the United States? 20 A. Yes. 21 Q. Did you ever tell Dallah Avco 22 that Al-Bayoumi was doing something other 23 than pursuing educational studies in the 24 United States? 25 A. No.</p>	<p style="text-align: right;">Page 152</p> <p>1 VIDEOGRAPHER: Off the record 2 at 2:45 p.m. 3 (Off the record at 2:45 p.m.) 4 VIDEOGRAPHER: Back on the 5 record at 3:02 p.m. 6 MR. KRY: Mr. Coombs, those are 7 all the questions we have for you at 8 this point. Thank you very much for 9 your time today. 10 THE WITNESS: You're welcome. 11 MS. PRITSKER: This is 12 Gabrielle Pritsker, counsel on behalf 13 of defendant Dubai Islamic Bank. I 14 just wanted to make a statement on the 15 record that DIB counsel was excluded 16 from the deposition at approximately 17 3:24 p.m. Eastern Standard Time and 18 then was brought back into the 19 deposition after it had already gone 20 off record on a break. And now we are 21 back, and Dallah Avco has completed 22 their questioning. 23 We ask that moving forward in 24 all depositions that the videographer 25 and the court reporter give two or</p>
<p style="text-align: right;">Page 151</p> <p>1 Q. Did you understand that the 2 payments that Al-Salmi had arranged for 3 Al-Bayoumi were intended to fund his 4 education and living expenses in the United 5 States? 6 A. That's what I reasoned to be, 7 yeah. 8 Q. Did you ever believe that 9 Al-Bayoumi was using the payments to fund 10 terrorism or other criminal activity? 11 A. No. 12 Q. Did you ever tell Dallah Avco 13 that Al-Bayoumi was using the payments to 14 fund terrorism or other criminal activity? 15 A. No. 16 Q. Did you ever tell Dallah Avco 17 that Al-Bayoumi was using the payments for 18 anything other than educational and living 19 expenses? 20 A. No. 21 MR. KRY: Great. Why don't we 22 take a ten-minute break. I suspect 23 I'm done, but I'll just confer with my 24 team to see if we have any more 25 questions.</p>	<p style="text-align: right;">Page 153</p> <p>1 three seconds for all counsel that are 2 getting excluded to make a brief 3 statement before and after the 4 exclusion. 5 Thank you. 6 CROSS-EXAMINATION 7 QUESTIONS BY MR. POUNIAN: 8 Q. Mr. Coombs, my name is Steve 9 Pounian. I'm with the law firm Kreindler & 10 Kreindler in New York, and we represent -- 11 we're part of the committee that represents 12 the 9/11 families in this litigation. I just 13 have a few questions to ask you to follow up 14 on some of the subjects that have been raised 15 today. 16 First, sir, could you just tell 17 us about your career in the US Army? How 18 long did you serve -- how long did you serve 19 in the Army? 20 A. It was 22 years. 21 Q. And what rank did you achieve 22 in the Army, sir? 23 A. I started when I was a private 24 in August 1960. I moved up to sergeant, went 25 to flight school, became a warrant officer,</p>

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<p style="text-align: right;">Page 154</p> <p>1 helicopter pilot. Went back to -- then on my 2 third tour, got commissioned to first 3 lieutenant, then to captain. I retired as a 4 major in logistics. 5 Q. And what year did you retire? 6 A. 1982. 7 Q. Now, you've been asked some 8 questions, sir, about money that's been paid 9 to Omar Al-Bayoumi, and you said that you 10 paid -- you directed payment of -- to 11 Mr. Bayoumi according to instructions that 12 were given to you. 13 Is that right, sir? 14 A. Yes, I paid only by 15 instructions. 16 Q. And that was through the 17 logistics department budget that you paid 18 those moneys to Mr. Bayoumi that you 19 described? 20 A. Yes. 21 Q. And I think you described it 22 started at \$60,000 a year and then it jumped 23 up to \$90,000 a year; is that right? 24 A. Yeah, the -- over the period of 25 that year, it increased from 60 to 90.</p>	<p style="text-align: right;">Page 156</p> <p>1 A. Yeah. 2 Q. And it's hiring Mr. Bayoumi at 3 a job with a -- with a certain job title of 4 SNR data processing tech. 5 Do you see that, sir? 6 A. Yes. 7 MR. DORRIS: Objection to form. 8 QUESTIONS BY MR. POUNIAN: 9 Q. And where was that -- do you 10 know where that job was located? 11 MR. KRY: Objection to form and 12 lack of foundation. 13 THE WITNESS: That would have 14 been across the street at the PCA 15 headquarters. 16 QUESTIONS BY MR. POUNIAN: 17 Q. And -- 18 A. The technical department was 19 over there. 20 Q. And you're saying "across the 21 street." That's in Jeddah, Saudi Arabia; is 22 that right? 23 A. Yeah, in Jeddah. The tech -- 24 the data collection area was there. Finance 25 was over there. The only thing that was in</p>
<p style="text-align: right;">Page 155</p> <p>1 Q. And when you say "that year," 2 you're talking about 1996; is that right? 3 A. Yeah, '95, '96, yeah. 4 Q. And then there was some 5 discussion about Mr. Bayoumi earning also a 6 salary and benefits through the Dallah Avco. 7 Were you aware of that at the 8 time that you were sending out payments in 9 your logistics department budget? 10 MR. KRY: Objection to form. 11 MR. DORRIS: Objection to form. 12 THE WITNESS: It didn't come 13 out of my budget, 'cause I didn't see 14 it. 15 QUESTIONS BY MR. POUNIAN: 16 Q. I just want to put before you 17 again what was marked as Exhibit 811, if we 18 could. 19 And this was one of the 20 documents that was referenced in your 21 declaration, sir. And it's signed by 22 Mr. Salmi, and it's dated -- it's dated July, 23 but it's effectively dated as of June 6, 24 1995. 25 Do you see that, sir?</p>	<p style="text-align: right;">Page 157</p> <p>1 my building was the maintenance and the 2 supplies, logistics. 3 Q. So Mr. Salmi was directing that 4 Mr. Bayoumi be given a job in Jeddah, while 5 at the same time Mr. Bayoumi was supposedly a 6 student in the United States; is that right? 7 MR. DORRIS: Objection to form. 8 Lack of foundation. 9 THE WITNESS: Yes. 10 MR. KRY: Join. 11 QUESTIONS BY MR. POUNIAN: 12 Q. If we could show the witness 13 Exhibit 86, please, that I just sent over to 14 the technician. It's from the Khan 15 deposition. 16 BRIAN FRONZAGLIA: We're 17 marking this as 825? 18 MR. POUNIAN: No, this is 19 already an exhibit. It's already 20 marked as Exhibit 86, so we're going 21 to reference it as Exhibit 86. 22 QUESTIONS BY MR. POUNIAN: 23 Q. Sir, if you could see, this is 24 the same date of June 6, 1995, the date that 25 Mr. Salmi ordered that Mr. Bayoumi be hired</p>

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<p style="text-align: right;">Page 158</p> <p>1 at this particular job in Jeddah. 2 And if we could scroll down, 3 please. 4 It provides for salary and 5 various other benefits. 6 Sir, were you aware at any time 7 that Mr. Bayoumi was receiving a salary and 8 benefits that was ordered by Mr. Salmi? 9 A. No. 10 MR. KRY: Objection to form. 11 QUESTIONS BY MR. POUNIAN: 12 Q. Was the amounts being paid to 13 Mr. Bayoumi through Dallah Avco separate from 14 any of the amounts that you were paying him 15 through the logistics department? 16 MR. DORRIS: Objection to form. 17 Lack of foundation. Assumes facts. 18 MR. KRY: Same objection. 19 MR. DORRIS: Also going to 20 object that this is outside the scope 21 of the direct examination. 22 MR. POUNIAN: You can have all 23 of those objections. 24 QUESTIONS BY MR. POUNIAN: 25 Q. Sir, maybe I could rephrase my</p>	<p style="text-align: right;">Page 160</p> <p>1 going through -- that I've already signed off 2 on. 3 Q. Okay. And those -- those 4 payments that you were making were directed 5 by Mr. Salmi also? 6 A. Yes. Yes. 7 Q. Can you describe, sir -- I 8 think you described this as double-dipping in 9 your testimony; is that right? 10 MR. DORRIS: Objection to form. 11 Incorrectly states the witness' 12 testimony. 13 THE WITNESS: Yes, that would 14 be double-dipping. 15 QUESTIONS BY MR. POUNIAN: 16 Q. Because he's making a salary, 17 and at the same time you're paying him 18 expenses through a separate budget. 19 Is that right, sir? 20 MR. DORRIS: Objection to form. 21 Lack of foundation. 22 THE WITNESS: I did not know 23 about this. 24 QUESTIONS BY MR. POUNIAN: 25 Q. Now, you said that the</p>
<p style="text-align: right;">Page 159</p> <p>1 question. 2 Did you hear my question? 3 A. Say it again. 4 Q. Okay. 5 Were the amounts that were 6 being paid to Mr. Bayoumi pursuant to this 7 directive of Mr. Salmi separate from the 8 amounts that you were paying him pursuant to 9 a separate directive of Mr. Salmi through the 10 logistics department? 11 MR. DORRIS: Objection to form. 12 Lack of foundation. 13 QUESTIONS BY MR. POUNIAN: 14 Q. You can answer, sir. 15 A. This is a normal salary. This 16 is a normal salary document. 17 Q. And were you, through the 18 logistics department, paying -- what were you 19 paying Mr. Bayoumi through that department? 20 A. I was paying it based on the 21 other documentation, not on salary. 22 Q. And when you say "the other 23 documentation," what are you referring to? 24 A. The other documentation is what 25 I would authorize, you know, for the payments</p>	<p style="text-align: right;">Page 161</p> <p>1 amounts -- we can take this down. Thank you. 2 You said that the amounts that 3 you paid -- that were paid to Mr. Bayoumi 4 through the logistics department budget, that 5 you had kept spreadsheets on that that you 6 provided to the FBI. 7 Is that right, sir? 8 A. Yes, I provided it to the -- to 9 the -- to the 9/11 Commission with the FBI in 10 New York when they flew me there to testify. 11 Q. And did you give them -- did 12 you give them documents that were on discs at 13 that time? 14 A. I had my -- my budget 15 spreadsheets that were in question that I 16 didn't feel right about, I would save them -- 17 save two discs. I left one behind, and I 18 took one with me. 19 Q. And -- 20 A. This, I took with me. I gave 21 them to the -- to the 9/11 Commission and the 22 FBI. 23 Q. And they retained those discs 24 that you gave to them? 25 MR. DORRIS: Objection. Lack</p>

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<p style="text-align: right;">Page 162</p> <p>1 of foundation.</p> <p>2 THE WITNESS: They kept them,</p> <p>3 yes. They kept them.</p> <p>4 QUESTIONS BY MR. POUNIAN:</p> <p>5 Q. And the information on these --</p> <p>6 that you had on these discs should also be</p> <p>7 maintained by the PCA; is that right?</p> <p>8 MR. KRY: Objection.</p> <p>9 MR. DORRIS: Objection. Lack</p> <p>10 of foundation.</p> <p>11 THE WITNESS: Yes.</p> <p>12 QUESTIONS BY MR. POUNIAN:</p> <p>13 Q. And these documents that the</p> <p>14 PCA should have which showed the amounts that</p> <p>15 were actually paid to Mr. Bayoumi?</p> <p>16 A. What I had was the</p> <p>17 spreadsheets, not documents. They were</p> <p>18 spreadsheets of the budget, each line, who it</p> <p>19 was directed to and the amounts, and then</p> <p>20 totaled up at the bottom. So I could build</p> <p>21 my spreadsheets on a graph. Okay?</p> <p>22 His name was listed four times,</p> <p>23 in four different lines. Okay? He was the</p> <p>24 only student with more than two.</p> <p>25 MR. KRY: Same objections.</p>	<p style="text-align: right;">Page 164</p> <p>1 QUESTIONS BY MR. POUNIAN:</p> <p>2 Q. And these -- this information</p> <p>3 would be held by the PCA in its files also,</p> <p>4 sir?</p> <p>5 MR. DORRIS: Objection. Lack</p> <p>6 of foundation. Beyond the scope of</p> <p>7 the direct, and untimely with the</p> <p>8 declaration.</p> <p>9 THE WITNESS: These were --</p> <p>10 would probably not be in PCA records</p> <p>11 now.</p> <p>12 QUESTIONS BY MR. POUNIAN:</p> <p>13 Q. All right.</p> <p>14 A. Because it was Lotus 1-2-3.</p> <p>15 They converted to Excel. Okay? These were</p> <p>16 old formats, so I doubt that they're still</p> <p>17 there.</p> <p>18 Q. Well, I'm not -- I'm not</p> <p>19 questioning whether you think that they're</p> <p>20 still there, sir.</p> <p>21 I'm just saying that they were</p> <p>22 PCA records; is that right?</p> <p>23 A. Not official records. They</p> <p>24 were my records of what I was doing.</p> <p>25 Q. And they reflected other</p>
<p style="text-align: right;">Page 163</p> <p>1 QUESTIONS BY MR. POUNIAN:</p> <p>2 Q. And when you say "his name,"</p> <p>3 who are you referring to?</p> <p>4 A. Omar Al-Bayoumi.</p> <p>5 Q. And when you say "he was the</p> <p>6 only student with more than two," what does</p> <p>7 that mean?</p> <p>8 A. Okay. Most of the students had</p> <p>9 a cost of living amount and tuition. Okay?</p> <p>10 There was always additions. There was</p> <p>11 tuition, cost of living allowance, and there</p> <p>12 was always additions. They were not</p> <p>13 specified sometimes. In that -- in the</p> <p>14 papers that you saw, I listed those as</p> <p>15 unspecified.</p> <p>16 MR. DORRIS: Objection. And</p> <p>17 this all goes outside both the scope</p> <p>18 of the direct and the declaration.</p> <p>19 You had an obligation to</p> <p>20 produce a declaration from the witness</p> <p>21 by a certain date, and now you're</p> <p>22 asking him to elicit testimony outside</p> <p>23 of that. That's quite objectionable.</p> <p>24 MR. POUNIAN: You've stated</p> <p>25 your objection.</p>	<p style="text-align: right;">Page 165</p> <p>1 records that would be held within -- by PCA?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 A. They reflected -- they</p> <p>5 reflected what you've already seen, the cost,</p> <p>6 and I put a line number on it.</p> <p>7 Q. And what I'm asking you, sir,</p> <p>8 is that the PCA should have documents</p> <p>9 reflecting the amounts that were paid through</p> <p>10 the logistics department to Omar Al-Bayoumi,</p> <p>11 as we've been discussing, the 60 and the</p> <p>12 \$90,000 amounts that were being paid to him?</p> <p>13 MR. DORRIS: Objection. Form.</p> <p>14 Foundation.</p> <p>15 THE WITNESS: They should have,</p> <p>16 but I don't know if they would after</p> <p>17 this many years.</p> <p>18 QUESTIONS BY MR. POUNIAN:</p> <p>19 Q. Okay. But they should have</p> <p>20 them; is that right?</p> <p>21 A. Yes.</p> <p>22 MR. DORRIS: Objection. Form.</p> <p>23 QUESTIONS BY MR. POUNIAN:</p> <p>24 Q. Mr. Coombs, you said that you</p> <p>25 drove -- you drove with Magdi Hanna past an</p>

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<p style="text-align: right;">Page 166</p> <p>1 apartment complex where Mr. Bayoumi lived, 2 you said, sir? 3 A. He told me -- I was in the 4 right seat, and he was taking me out to 5 lunch. And he drove me past an apartment 6 complex and he said, "That's where he lives." 7 It was a very nice apartment complex. 8 Q. And -- 9 A. And a parking area. 10 Q. And when he said "that's where 11 he lives," who was he referring to? 12 A. Omar Al-Bayoumi. 13 Q. And where were you at the time 14 when he pointed that out? 15 A. I was in California. 16 Q. Okay. And where specifically 17 in California? 18 A. I was -- we were going from 19 lunch at Ercan over -- across the street from 20 Disney World to the restaurant. And I can't 21 give you -- I've been to California quite a 22 few times, but in that area, not very often. 23 Q. And Ercan's offices were 24 located in Newport Beach; is that right? 25 A. Yeah. Yeah.</p>	<p style="text-align: right;">Page 168</p> <p>1 wasn't. But, yeah, that's -- I don't 2 remember the name of the restaurant. It was 3 just a nice apartment complex as we drove 4 past it, and it was very upscale. It was 5 nice. 6 Q. Okay. And if we go to the next 7 sentence here, sir, it says, "On the way to 8 the restaurant, we drove by an apartment 9 complex." If we could highlight that, 10 please. 11 And do you recall that the 12 apartment complex was in Costa Mesa, 13 California? 14 A. Yes. 15 Q. And he said that Mr. Bayoumi 16 had an apartment at that complex? 17 A. Yes. 18 Q. And did Mr. Hanna talk to you 19 about Mr. Bayoumi and his relationship with 20 Mr. Bayoumi? 21 A. He did not detail it, but he 22 was very frustrated, so he didn't like 23 talking about him. 24 Q. And what was he frustrated 25 about?</p>
<p style="text-align: right;">Page 167</p> <p>1 Q. And you were driving to 2 Disneyland, and then you saw this apartment 3 complex, and Mr. Hanna pointed it out to you? 4 A. He was driving. He pointed it 5 out to me and just kept going. 6 Q. And why did he point that 7 complex out to you, sir? 8 A. He was just telling me that's 9 where he lived. 10 Q. If we could put up, please, 11 Exhibit 810. And go to page 4, please. 12 And if we just go to the last 13 paragraphs, the first two sentences at the 14 very bottom. 15 It just says -- the next -- 16 yeah, down to -- yeah. 17 Is this a description, sir, of 18 that particular occasion in which you were 19 with Mr. Hanna? 20 A. Yeah. 21 Q. And you say you were driving 22 from the Ercan office to a restaurant across 23 the street from Disneyland. 24 Do you see that, sir? 25 A. Yeah. Mr. Hanna was driving; I</p>	<p style="text-align: right;">Page 169</p> <p>1 A. That he didn't want to take 2 orders from him. He didn't want to do what 3 he wanted him to do. And everything in -- 4 Omar would come to him and tell him things 5 that he wanted, and ANSS didn't want to do 6 it. 7 And I stayed out of the fray. 8 I didn't get into it with him. I just 9 listened to him. I didn't say a word. 10 Q. Now, there came a time, sir, 11 when you met Mr. Bayoumi; is that right? 12 A. Yeah. 13 Q. Yeah, if we could go to the top 14 of this page, please. 15 The very first paragraph 16 right -- and the first two sentences, three 17 sentences, if we could highlight those. 18 And it states that you were at 19 the Ercan office, and you met Mr. Hanna 20 there; is that right? 21 A. Mr. Hanna took me, had picked 22 me up, took me to the office, took me by -- 23 {audio interruption} -- and I had never met 24 him before. 25 Q. You had never met who before?</p>

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<p>1 Mr. Bayoumi are you referring to?</p> <p>2 A. I never met Al-Bayoumi.</p> <p>3 Q. And you met him on this</p> <p>4 occasion with Mr. Hanna; is that right?</p> <p>5 A. Yes.</p> <p>6 Q. And did Mr. Hanna introduce you</p> <p>7 to Mr. Bayoumi?</p> <p>8 A. Yeah. He said, I want to</p> <p>9 introduce you to him.</p> <p>10 Q. And did you have occasion to</p> <p>11 speak to Mr. Bayoumi at that time?</p> <p>12 A. No. I reached out to shake his</p> <p>13 hand, and he didn't do it. And he just sort</p> <p>14 of, you know -- and then he asked me my name.</p> <p>15 He said, "isem?" What's your</p> <p>16 name?</p> <p>17 I said, "Samuel."</p> <p>18 And then he asked me if I was a</p> <p>19 Jew.</p> <p>20 I said, "la," no. "Ana</p> <p>21 almani." I am a German.</p> <p>22 And then he shook my hand.</p> <p>23 Q. Well, let's go down to the next</p> <p>24 paragraph here. It's -- if we could just</p> <p>25 highlight the next paragraph.</p>	<p>1 up because that's where he was getting his</p> <p>2 money, was through them, and his apartment</p> <p>3 and stuff like that that was all being paid</p> <p>4 through Ercan.</p> <p>5 Q. Now, we just took the testimony</p> <p>6 of Mr. Bayoumi last week, and he said he</p> <p>7 didn't know Magdi Hanna.</p> <p>8 Is that a true statement, sir?</p> <p>9 Would that be a true statement</p> <p>10 if Mr. Bayoumi said he didn't know Magdi</p> <p>11 Hanna?</p> <p>12 A. That is not a true statement.</p> <p>13 Q. And he also --</p> <p>14 A. He knew --</p> <p>15 Q. I'm sorry.</p> <p>16 A. He knew him.</p> <p>17 MR. DORRIS: Objection.</p> <p>18 Foundation.</p> <p>19 MR. POUNIAN: I have no further</p> <p>20 questions.</p> <p>21 MR. DORRIS: Give me two</p> <p>22 seconds. I'm going to ask some</p> <p>23 additional questions. One second.</p> <p>24 We don't need to take a full</p> <p>25 15-minute break, but, like, two</p>
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<p>1 It says that he asked you your</p> <p>2 name, and you replied Samuel, and then he</p> <p>3 asked if you were Jewish.</p> <p>4 And then did Mr. Bayoumi ask</p> <p>5 you about a request that he had placed for a</p> <p>6 new car for himself?</p> <p>7 A. Yes. And I had told him that I</p> <p>8 could not approve anything like that, that he</p> <p>9 had to go to Mohammed Al-Salmi. And that was</p> <p>10 the end of the subject on it.</p> <p>11 Q. And was Mr. Bayoumi at</p> <p>12 Mr. Hanna's office --</p> <p>13 A. Yes, he was that day.</p> <p>14 Q. Okay. And he had been there</p> <p>15 before you arrived?</p> <p>16 A. No, he was there -- Hanna told</p> <p>17 me he was there because he wanted to get some</p> <p>18 furniture for the apartment that he had</p> <p>19 pointed out to me. His wife wanted some</p> <p>20 additional furniture, and then he added a car</p> <p>21 when I walked up to him.</p> <p>22 Q. And -- all right. So was it</p> <p>23 clear to you that Mr. Bayoumi knew Mr. Hanna?</p> <p>24 A. Oh, yeah. They -- they knew</p> <p>25 each other because Al-Salmi had hooked them</p>	<p>1 minutes would be good.</p> <p>2 VIDEOGRAPHER: Off the record</p> <p>3 at 3:26 p.m.</p> <p>4 (Off the record at 3:26 p.m.)</p> <p>5 VIDEOGRAPHER: Back on the</p> <p>6 record at 3:28 p.m.</p> <p>7 REDIRECT EXAMINATION</p> <p>8 QUESTIONS BY MR. DORRIS:</p> <p>9 Q. Brian, can you please pull back</p> <p>10 up Exhibit 810, the declaration?</p> <p>11 Please turn to page 3, the</p> <p>12 fourth full paragraph.</p> <p>13 Now, with respect to Bayoumi's</p> <p>14 salary, you testified earlier today that you</p> <p>15 reviewed three documents shown to you by</p> <p>16 Kreindler & Kreindler - DA1016, DA2267 and</p> <p>17 DA398, correct? Mr. Coombs?</p> <p>18 A. Yes.</p> <p>19 Q. And those were the only three</p> <p>20 documents you were shown and reviewed by</p> <p>21 Kreindler & Kreindler, as you testified</p> <p>22 earlier, correct?</p> <p>23 A. Yes.</p> <p>24 Q. Can we bring up Exhibit 86 that</p> <p>25 was displayed during Mr. Pounian's</p>

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<p style="text-align: right;">Page 174</p> <p>1 questioning?</p> <p>2 This document is DA99, correct?</p> <p>3 You see the lower right, there's a labeling</p> <p>4 that says DA99?</p> <p>5 A. Yes.</p> <p>6 Q. This was not one of the</p> <p>7 documents shown to you by Kreindler &</p> <p>8 Kreindler, correct?</p> <p>9 A. No.</p> <p>10 Q. You had never seen this</p> <p>11 document before today, correct?</p> <p>12 A. No.</p> <p>13 Q. This was not a document that</p> <p>14 you would have seen in your employment as</p> <p>15 manager of the logistics department, correct?</p> <p>16 A. No, it was -- that's personnel.</p> <p>17 Q. And you had no responsibility</p> <p>18 for paying salaries to Omar Al-Bayoumi,</p> <p>19 correct?</p> <p>20 A. No.</p> <p>21 Q. And you had no knowledge during</p> <p>22 your time at Dallah Avco from 1994 to 1997 of</p> <p>23 whether Omar Al-Bayoumi received any salary</p> <p>24 or not, correct?</p> <p>25 MR. KRY: Objection to the form</p>	<p style="text-align: right;">Page 176</p> <p>1 Hanna, correct?</p> <p>2 A. Yes. Yes.</p> <p>3 Q. Apart from what Magdi Hanna</p> <p>4 told you, you had no knowledge of where Omar</p> <p>5 Al-Bayoumi lived, correct?</p> <p>6 A. No, I did not.</p> <p>7 Q. You were also asked about Magdi</p> <p>8 Hanna's relationship with Omar Al-Bayoumi,</p> <p>9 and I believe you said he was frustrated by</p> <p>10 Bayoumi; is that correct?</p> <p>11 A. He did not like to talk about</p> <p>12 him, and obvious frustration because of the</p> <p>13 requests that were coming to him like for</p> <p>14 furniture and stuff like that and...</p> <p>15 Q. Your understanding of Omar</p> <p>16 Al-Bayoumi's relationship with Magdi Hanna</p> <p>17 came from statements made by Magdi Hanna,</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. It was not something you</p> <p>21 yourself personally experienced -- knew</p> <p>22 about?</p> <p>23 A. No.</p> <p>24 Q. You testified about whether</p> <p>25 Magdi Hanna knew Omar Al-Bayoumi, correct?</p>
<p style="text-align: right;">Page 175</p> <p>1 of the question.</p> <p>2 THE WITNESS: That's correct.</p> <p>3 MR. KRY: Objection. Misstates</p> <p>4 the facts.</p> <p>5 MR. DORRIS: Sure, I'll reask</p> <p>6 it.</p> <p>7 QUESTIONS BY MR. DORRIS:</p> <p>8 Q. And you had no knowledge during</p> <p>9 your time at the logistics department from</p> <p>10 1994 to 1997 of whether Omar Al-Bayoumi</p> <p>11 received any salary or not, correct?</p> <p>12 A. Normal salary? No, I didn't</p> <p>13 know. I just knew about what was coming</p> <p>14 through my office.</p> <p>15 Q. Now, you -- in Mr. Pounian's</p> <p>16 questioning you were asked some questions</p> <p>17 about Magdi Hanna's relationship with Omar</p> <p>18 Al-Bayoumi, correct?</p> <p>19 A. Yeah.</p> <p>20 Q. And all of the statements you</p> <p>21 made were -- the basis for those were things</p> <p>22 that Magdi Hanna told you, correct?</p> <p>23 A. Yeah.</p> <p>24 Q. The statement about where Omar</p> <p>25 Al-Bayoumi lived was told to you by Magdi</p>	<p style="text-align: right;">Page 177</p> <p>1 A. He did know him, yes.</p> <p>2 Q. The only time you saw Magdi</p> <p>3 Hanna and Omar Al-Bayoumi interact was the</p> <p>4 one encounter at Ercan, correct?</p> <p>5 A. Yes.</p> <p>6 Q. And any other information you</p> <p>7 have about a relationship between Magdi Hanna</p> <p>8 and Omar Al-Bayoumi came from Magdi Hanna,</p> <p>9 correct?</p> <p>10 A. That's correct. That's</p> <p>11 correct.</p> <p>12 Q. The only thing you experienced</p> <p>13 yourself was the one encounter, which I think</p> <p>14 you testified was at most ten minutes and</p> <p>15 25 years ago, correct?</p> <p>16 A. Yes.</p> <p>17 MR. DORRIS: Thank you. That's</p> <p>18 all my questions.</p> <p>19 MR. KRY: I just have one or</p> <p>20 two questions.</p> <p>21 RECROSS EXAMINATION</p> <p>22 QUESTIONS BY MR. KRY:</p> <p>23 Q. Mr. Coombs, you testified about</p> <p>24 a Lotus 1-2-3 spreadsheet that you created at</p> <p>25 Airways Engineering to track the educational</p>

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<p style="text-align: right;">Page 178</p> <p>1 funding payments to students at the direction 2 of Al-Salmi. 3 Do you remember that testimony? 4 A. Yeah, I -- 5 Q. Did you ever send a copy of 6 that spreadsheet to Dallah Avco? 7 A. No. It was -- it was -- it was 8 what I was doing personally to track things. 9 I could make myself spreadsheets so that when 10 I went to brief about my budget, I could draw 11 it out and everybody was -- this is before we 12 had all the software we have now. 13 Q. And so -- 14 A. But I knew how to build 15 spreadsheets. But I knew how to do it. I 16 knew how to build the spreadsheets and 17 things, and so I did it myself. 18 And then I would -- I would 19 build it and everything so I could brief -- 20 I'd stand up -- they'd ask me to stand up and 21 show my budget and everything else, and then 22 I'd brief it. And then they'd tell me to sit 23 down, and then they'd tell me to leave. 24 Q. Okay. The "they" you're 25 referring to there is Airways Engineering?</p>	<p style="text-align: right;">Page 180</p> <p>1 CERTIFICATE 2 3 I, CARRIE A. CAMPBELL, Registered 4 Diplomate Reporter, Certified Realtime 5 Reporter and Certified Shorthand Reporter, do 6 hereby certify that prior to the commencement 7 of the examination, Samuel G. Coombs, was 8 duly sworn by me to testify to the truth, the 9 whole truth and nothing but the truth. 10 I DO FURTHER CERTIFY that the 11 foregoing is a verbatim transcript of the 12 testimony as taken stenographically by and 13 before me at the time, place and on the date 14 hereinbefore set forth, to the best of my 15 ability. 16 17 I DO FURTHER CERTIFY that I am 18 neither a relative nor employee nor attorney 19 nor counsel of any of the parties to this 20 action, and that I am neither a relative nor 21 employee of such attorney or counsel, and 22 that I am not financially interested in the 23 action. 24 25 CARRIE A. CAMPBELL, NCRA Registered Diplomate Reporter Certified Realtime Reporter Notary Public Dated: July 12, 2021</p>
<p style="text-align: right;">Page 179</p> <p>1 A. Huh? 2 Q. The "they" you were referring 3 to there was Airways Engineering? 4 A. Yeah. Yeah. 5 MR. KRY: I have no further 6 questions. Thank you. 7 MR. POUNIAN: Thank you, 8 Mr. Coombs. 9 VIDEOGRAPHER: This concludes 10 today's deposition. The time is 11 3:35 p.m. We're off the record. 12 (Deposition concluded at 3:35 p.m.) 13 ----- 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 181</p> <p>1 INSTRUCTIONS TO WITNESS 2 3 Please read your deposition over 4 carefully and make any necessary corrections. 5 You should state the reason in the 6 appropriate space on the errata sheet for any 7 corrections that are made. 8 After doing so, please sign the 9 errata sheet and date it. You are signing 10 same subject to the changes you have noted on 11 the errata sheet, which will be attached to 12 your deposition. 13 It is imperative that you return 14 the original errata sheet to the deposing 15 attorney within sixty (60) days of receipt 16 of the deposition transcript by you. If you 17 fail to do so, the deposition transcript may 18 be deemed to be accurate and may be used in 19 court. 20 21 22 23 24 25</p>